TSD File Inventory Index

Date: January 27, 2000

Initial: CM Henstead

Facility Name:	Chemical Waste Disposal, Inc. (Mac Farlane Site)
Facility Identification Number:	LD 000 172 441

A.1 General Correspondence		B.2 Permit Docket (B.1.2)	
A.2 Part A / Interim Status	X	.1 Correspondence	
.1 Correspondence	X	.2 All Other Permitting Documents (Not Part of the ARA)	
.2 Notification and Acknowledgment	X	C.1 Compliance - (Inspection Reports)	
.3 Part A Application and Amendments	X	C.2 Compliance/Enforcement	
.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications	
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
.6 Annual and Biennial Reports		C.3 FOIA Exemptions - Non-Releasable Documents	
A.3 Groundwater Monitoring	X	D.1 Corrective Action/Facility Assessment	X
.1 Correspondence	X	.1 RFA Correspondence	
.2 Reports	X	.2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure	X	.3 State Prelim. Investigation Memos	
.1 Correspondence	X	.4 RFA Reports	X
.2 Closure/Post Closure Plans, Certificates, etc		D. 2 Corrective Action/Facility Investigation	
A.5 Ambient Air Monitoring		.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan	
.2 Reports		.3 RFI Program Reports and Oversight	
B.1 Administrative Record		.4 RFI Draft /Final Report	

.5 RFI QAPP		.6 CMI QAPP	
.6 RFI QAPP Correspondence		.7 Lab Data, Soil-Sampling/Groundwater	
.7 Lab Data, Soil-Sampling/Groundwater		.8 Progress Reports	
.8 RFI Progress Reports		D.5 Corrective Action/Enforcement	
.9 Interim Measures Correspondence		.1 Administrative Record 3008(h) Order	
.10 Interim Measures Workplan and Reports		.2 Other Non-AR Documents	
D.3 Corrective Action/Remediation Study		E. Boilers and Industrial Furnaces (BIF)	
.1 CMS Correspondence		.1 Correspondence	
.2 Interim Measures		.2 Reports	
.3 CMS Workplan		F.1 Imagery/Special Studies (Videos, Photos, Disks, Maps, Blueprints, Drawings, and Other Not Oversized Special Materials.)	X
.4 CMS Draft/Final Report		G.1 Risk Assessment	
.5 Stabilization		.1 Human/Ecological Assessment ...	
.6 CMS Progress Reports		.2 Compliance and Enforcement ...	
.7 Lab Data, Soil-Sampling/Groundwater		.3 Enforcement Confidential	
D.4 Corrective Action Remediation Implementation		.4 Ecological - Administrative Record	
.1 CMI Correspondence		.5 Permitting	
.2 CMI Workplan		.6 Corrective Action/Remediation Study ...	
.3 CMI Program Reports and Oversight		.7 Corrective Action Remediation Implementation ...	
.4 CMI Draft/Final Reports		.8 Endangered Species Act	
.5 CMI QAPP		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.

Comments: Documents do not justify individual folder per schedule.

A.2 Part A/
Interim Status

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

JUN 16 1982

Mr. Robert Hewes
Vice President - Manufacturing
Central Quality Industries
900 South Division
Polo, Illinois 61064

RE: Interim Status Acknowledgement USEPA ID No. ILD 005176441
FACILITY NAME: CENTRAL QUALITY INDUSTRIES

Dear Mr. Hewes:

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosure

YES 6/15/82

FACILITY NAME
CENTRAL QUALITY INDUSTRIES

EPA ID NUMBER
ILD005176441

FACILITY OPERATOR
CENTRAL QUALITY INDUSTRIES INC

FACILITY OWNER
CENTRAL QUALITY INDUSTRIES INC

FACILITY LOCATION
900 SOUTH DIVISION
POLO IL 61064

PROCESS CODE	DESIGN CAPACITY	UNIT OF MEASURE
S01	2000.00000	G
S03	600.00000	Y

OK 6/15/82 RLS

KEY

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE
STORAGE:		
CONTAINER	S01	G OR L
TANK	S02	G OR L
WASTE PILE	S03	Y OR C
SURFACE IMPOUNDMENT	S04	G OR L
DISPOSAL:		
INJECTION WELL	D79	G,L,U, OR V
LANDFILL	D80	A OR F
LAND APPLICATION	D81	B OR Q
OCEAN DISPOSAL	D82	U OR V
SURFACE IMPOUNDMENT	D83	G OR L
TREATMENT:		
TANK	T01	U OR V
SURFACE IMPOUNDMENT	T02	U OR V
INCINERATOR	T03	D,W,E, OR H
OTHER	T04	J,R,N,S,U,V

UNIT OF MEASURE	CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS\HOUR	W
GALLONS\HOUR	E
LITERS\HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q
POUNDS\HOUR	J
KILOGRAMS\HOUR	R
TONS PER DAY	N
METRIC TONS\DAY	S

APR 16 1984

5HW-12

Robert D. Hewes, Vice President-Manufacturing
Central Quality Industries Incorporated
900 South Division Street
P.O. Box 247
Polo, Illinois 61064

Re: Withdrawal of RCRA
Part A Application
ILD 005176441

Dear Mr. Hewes:

The U.S. Environmental Protection Agency has reviewed your request to withdraw your RCRA Part A permit application. On the basis of the information you provided, we determined that your operation included treatment, storage, or disposal of hazardous waste subject to 35 Ill. Adm. Code Part 725. Therefore, a closure plan must be submitted directly to Permit Section, Division of Land Pollution Control, Illinois Environmental Protection Agency, 2200 Churchill Road, Springfield, Illinois 62706. Requirements for closure are found at 35 Ill. Adm. Code Part 725. Questions on closure should be directed to Illinois EPA at the above address.

Thank you for your cooperation in this matter.

Sincerely,

Robert L. Stone
State Implementation Officer

cc: Harry Chappel, IEPA
Bill Radlinski, IEPA
~~Ken Bechely~~, IEPA
R. Wengrow

5HW:B.STONE:ns :4/12/84

	TYPIST	AUTHOR	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	TPS CHIEF	WMB CHIEF	WMD DIRECTOR
INITIALS	N.S.							
DATE	4/12/84	4-12-84						

Please print or type in the unshaded areas only
(fill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-R0175 265

FORM 1 GENERAL — EPA

U. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER

S														T/A	C
F	I	L	D	0	0	5	1	7	6	4	4	1		3	D

1 2 - 13 14 15

LABEL ITEMS

- II. EPA I.D. NUMBER
- III. FACILITY NAME
- V. FACILITY MAILING ADDRESS
- VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill—in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill—in area*(s)* below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of **bold—faced terms.**

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a **publicly owned treatment works** which results in a **discharge** to **waters of the U.S.?** (FORM 2A)		X	
B. Does or will this facility *(either existing or proposed)* include a **concentrated animal feeding operation** or **aquatic animal production facility** which results in a **discharge** to **waters of the U.S.?** (FORM 2B)		X	
C. Is this a facility which currently results in **discharges** to **waters of the U.S.** other than those described in A or B above? (FORM 2C)		X	
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a **discharge** to **waters of the U.S.?** (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of **hazardous wastes?** (FORM 3)	X		X
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed **stationary source** which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area?** (FORM 5)		X	
J. Is this facility a proposed **stationary source** which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area?** (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP: CENTRAL QUALITY INDUSTRIES INC

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*
2 HEWES ROBERT VICE PRES-MFG	815 946 2311

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

3 900 SOUTH DIVISION

B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 POLO	IL	61064

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

5 900 SOUTH DIVISION

B. COUNTY NAME

OGLE

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE *(if known)*
6 POLO	IL	61064	071

CONTINUE ON REVERSE

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST	B. SECOND
3524 (specify) Garden Tractor And Lawn and Garden Equipment	3469 (specify) Metal Stampings, N.E.C.
C. THIRD	**D. FOURTH**
3499 (specify) Fabricated Metal Products N.E.C.	2522 (specify) Metal Office Furniture

VIII. OPERATOR INFORMATION

A. NAME

CENTRAL QUALITY INDUSTRIES INC

B. Is the name listed in Item VIII-A also the owner? [X] YES [ ] NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)

F = FEDERAL
S = STATE
P = PRIVATE
M = PUBLIC (other than federal or state)
O = OTHER (specify)

P (specify)

D. PHONE (area code & no.) A 815 946 2311

E. STREET OR P.O. BOX

900 SOUTH DIVISION

F. CITY OR TOWN	G. STATE	H. ZIP CODE
POLO	IL	61064

IX. INDIAN LAND

Is the facility located on Indian lands? [ ] YES [X] NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)	D. PSD (Air Emissions from Proposed Sources)
9 N NA	9 P NA
B. UIC (Underground Injection of Fluids)	**E. OTHER (specify)**
9 U NA	9 NA (specify)
C. RCRA (Hazardous Wastes)	**E. OTHER (specify)**
9 R NA	9 NA (specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

FQ: A/50

XII. NATURE OF BUSINESS (provide a brief description)

Central Quality Industries is a metal stamping and fabricating house (including shearing, punch press, press brakes, spotwelding, painting and assembly). Products include Lawn Spreaders, Tool Boxes, Saw Tables, File Cabinets, Yard Carts.

FQ: A 51

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
Robert D. Hewes Vice President - Mfg.	Robert D Hewes	11-18-80

COMMENTS FOR OFFICIAL USE ONLY

C

Please print or type in the unshaded areas only
(fill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004 265

FORM 3 RCRA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

S													T/A	C
F	I	L	D	0	0	5	1	7	6	4	4	1	3	1
1	2											13	14	15

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS
23	24 - 29	

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[X] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)* (71)

C 8 (15) — FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

YR.	MO.	DAY
8 0 (73 74)	1 1 (75 76)	1 9 (77 78)

[X] 2. NEW FACILITY *(Complete item below.)* (71)

FOR NEW FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR.	MO.	DAY
8 0 (73 74)	1 1 (75 76)	1 9 (77 78)

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

[ ] 1. FACILITY HAS INTERIM STATUS (72)

[ ] 2. FACILITY HAS A RCRA PERMIT (72)

III. PROCESSES — CODES AND DESIGN CAPACITIES

A. PROCESS CODE — Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY — For each code entered in column A enter the capacity of the process.

1. AMOUNT — Enter the amount.
2. UNIT OF MEASURE — For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S 0 2	600	G	
X-2	T 0 3	20	E	
1	S 0 1	2000 000	G	
2	S 0 3	600 000	Y	
3				
4				
5				
6				
7				
8				
9				
10				

S C DUP T/A 3 C 1

Continued from the front.

III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES *(code "T04")*. FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER – Enter the four–digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four–digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY – For each **listed waste** entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each **characteristic** or **toxic contaminant** entered in column A estimate the total annual quantity of all the non–listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE – For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:
   For listed hazardous waste: For each **listed** hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non–listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate **all** the processes that will be used to store, treat, and/or dispose of all the non–listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non–listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				*included with above*

Continued from page 2.
NOTE: Photocopy this page before completing i[illegible] have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)															FOR OFFICIAL USE ONLY													
S													T/A	C	S											T/A	C	
W	I	L	D	0	0	5	1	7	6	4	4	1	3	1	W	D	U	P								3	2	D U P
1	2											13	14	15	1	2								13	14	15	23	-	26

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
	23 - 26	27 - 35	36	27 - 29 / 27 - 29 / 27 - 29 / 27 - 29	
1	F 0 1 7	20,000 000	P	S 0 1 S 0 3	
2	U 1 5 9	75 000	P	S 0 1	
3	U 2 2 0	15 000	P	S 0 1	
4	U 2 3 9	1,500 000	P	S 0 1	
5	D 0 0 2	2,400 000	P	S 0 1	
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					

(enter "A", "B", "C", etc. behind the "3" to identify photocopied pages)

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTE (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

F	I	L	D	0	0	5	1	7	6	4	4	1	3	6
1	2											13	14	15

V. FACILITY DRAWING

All **existing** facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail).* F6: N/55

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground–level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail).* F6: N/56

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)						LONGITUDE (degrees, minutes, & seconds)					
4	1	5	8	4	0	0	8	9	3	4	3	6	0
65	66	67	68	69	71	72	-	74	75	76	77	-	79

VIII. FACILITY OWNER

[X] A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. (area code & no.)
E	

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
F	G		

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
Robert D. Hewes	Robert D Hewes	11-18-80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED

ENC # 2

217/782-6760

Refer to: LPC14104501 -- Ogle County
Polo/Central Quality Industries

February 27, 1985

Yates & Auberle
Attention: John Yates
The Drake Oak Brook Plaza
2215 York Road, Suite 114
Oak Brook, Illinois 60521

Dear Mr. Yates:

Your submittal of September 24, 1984 has been reviewed by this Section and the following comments are made.

Your sampling results indicate that this facility had no significant impact on surface or groundwater quality. These results also indicate, however, that some contaminated soils remain on-site. Pending a USEPA evaluation of your facility, we are requesting, at a minimum, that you propose a water monitoring program of limited scope. This monitoring program may be terminated if a favorable evaluation is completed.

If you have any questions regarding this letter, don't hesitate to contact me.

Sincerely,

Terry G. Ayers, P.E.
Site Assessment Unit
Hazardous Substance Control Section
Division of Land Pollution Control

TGA:tk/25

cc: **Central Quality Industries**
Mark Haney
Dave Favero, USEPA
Jim Frank
Division File

Illinois Environmental Protection Agency 2200 Churchill Road, Springfield, IL 62706

217/782-6761

Refer to: 1410450001 -- Ogle County
Central Quality Industries Inc.
ILD005176441
RCRA - Permits Attn: Environmental Coordinator
or Plant Manager

May 6, 1988

Central Quality Industries, Inc.
900 S. Division Ave.
Polo, IL 61064

Dear Sir:

According to Agency files, your facility currently manages hazardous waste in containers and/or tanks subject to the requirements of 35 IAC 700-725. 35 IAC 703.157(f) states that interim status for any hazardous waste storage or treatment facility will be terminated November 8, 1992, unless the facility submits Part B of the RCRA permit application for these units to this Agency by November 8, 1988. This letter is written to (1) make you aware of this requirement and (2) describe the actions which must be taken in response to this requirement.

According to 35 IAC 703.157(f), if an existing facility desires to (1) store hazardous waste on-site for greater than ninety (90) days, (2) treat hazardous waste, or (3) store hazardous waste as a commercial facility after November 8, 1992, it must submit Part B of the RCRA permit application to this Agency by November 8, 1988. The information which must be contained in this application is described in 35 IAC 703, Subpart B. The enclosed document, entitled "RCRA Permit Guidance" provides more detail regarding the necessary contents of the application and also identifies several guidance documents which will be useful in developing the application. Also included in this document is the form which must be used when submitting the application.

If a facility does not desire to continue storing and/or treating hazardous waste after November 8, 1992, it must close the storage and/or treatment unit(s) present at the facility prior to this date. Closure, in this instance, basically means that all contamination must be removed from the unit(s) and if necessary, from the area surrounding these units. The requirements which must be met in closing these units are contained in 35 IAC 725, Subpart G. For you convenience, guidance for the development of a closure plan is contained in the enclosed document entitled "Instructions for the Preparation of Closure Plans for Interim Status RCRA Hazardous Waste Facilities." PLEASE NOTE THAT A CLOSURE PLAN DOES NOT NEED TO BE SUBMITTED AT THIS TIME. IT MUST HOWEVER, BE SUBMITTED TO THE AGENCY NO LATER THAN MAY 8, 1992.

In some instances, there may be several interim status hazardous waste management units at a facility. The facility may desire to pursue a final RCRA permit for a portion of these units and close the rest of them. Because of the uncertainty associated with this option, all interim status units at a facility must be included in Part B of the RCRA permit application, unless a closure plan for the units being closed is submitted with the Part B. If a closure plan is submitted with the Part B, the application need only address those units which will remain in operation.

The only alternatives available for hazardous waste treatment and storage facilities to meet the requirements of 35 IAC 703.157(f) are (1) submit Part B of the RCRA permit application by November 8, 1988 or (2) close by November 8, 1992. However, some facilities may have previously filed Part A of the RCRA permit application in error and now feel that the hazardous waste management activities carried out at the facility do not require a RCRA permit (i.e. the Part A was filed for protective measures). If this is the case, the Agency requests that information supporting this position be submitted no later than November 8, 1988. The Agency can then review the information submitted and correct its records accordingly. The information which must be submitted to make this demonstration is contained in the enclosed document entitled "Facility Part A Withdrawal Request Form."

Finally, some facilities may have closed or are currently closing in accordance with an IEPA approved closure plan. (Please bear in mind this letter is going out to over 200 facilities; some closed facilities may inadvertently receive this letter.) In this instance, the Agency requests that a copy of (1) the closure plan approval letter and (2) the letter from the Agency accepting the certifications of the owner/operator and the rgistered professional engineer that closure was carried out in accordance with the approved closure plan (if closure has been completed) be submitted by November 8, 1988. The Agency will again be able to review this information and correct its records accordingly.

Because of the large number of facilities subject to the requirements of 35 IAC 703.157(f), the Agency requests that all facilities receiving this letter complete the enclosed form entitled "RCRA Permit Information Form." The form has been developed such that it can be used by a facility falling into any of the five categories described above (pursuing a final permit, planning to close, pursuing a permit for only a portion of the interim status units and closing the other units, protective filers, closed in accordance with an IEPA approved closure plan). This form must be submitted to the Agency no later than November 8, 1988, along with all required attachments. Failure to do so may subject a facility to enforcement under State and/or Federal regulations and possible monetary penalties up to $25,000 per day of noncompliance.

The RCRA Permit Information Form and all required attachments must be submitted in triplicate (original and two (2) copies) to the following address:

Permit Section, RCRA Unit
Division of Land Pollution Control
Illinois Environmental Protection Agency
2200 Churchill Road
P.O. Box 19276
Springfield, IL 62794-9276

If you have any questions regarding this letter, please contact Jim Moore at 217/782-9878.

Very truly yours,

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:JKM:mab/1203j/1204j/

Enclosures

cc: Division File
Compliance
Rockford Region
USPEA Region V

A.3 Groundwater/Soil

CENTRAL QUALITY INDUSTRIES, INC.

900 SOUTH DIVISION STREET • P.O. BOX 247
POLO, ILLINOIS 61064
area code 815/946-2311

new

March 3, 1983

Mr. Robert Stone
USEPA
Region V
111 West Jackson Boulevard
Chicago, Illinois 60604

ILD005 176441 PA) G, TSD, PAS1

Dear Mr. Stone:

Within the last several months Central Quality has contracted with John J. Yates and Associates to review our compliance status with both USEPA and IEPA. As part of this review, our purpose of being an owner and operator of a hazardous waste facility has been questioned.

The intent in filing Part A of the Hazardous Waste Permit Application was one of not really knowing our current or future needs nor fully understanding the scope and magnitude of being a TSD facility. It was felt since we generated such small quantities, plus the fact of being 90 miles or more from the permitted TSD facilities we deal with, it would be to our benefit financially, to file Part A. It was reasoned that by storing our wastes and shipping only once or twice a year, rather than four or five times a year to other permitted TSD facilities for disposal, we would have a significant cost savings.

In light of our better understanding of the current regulations and the anticipated requirements forthcoming in Part B, it is believed that it is going to be far more costly to continue to operate as a hazardous waste facility than to stop storing our wastes for longer than 90 days and to start shipping five or six times a year to other permitted facilities for disposal.

It should be pointed out all currently stored hazardous materials will have been shipped to other permitted TSD facilities for disposal within the next 120 days and at that time, our policy of storing beyond the 90 day limit will have ceased.

Central Quality would very much like your assistance in getting us removed from any further permitting processes (Part B). We feel with our present knowledge, the need for being a hazardous waste facility no longer exists and coupled with the fact we will no longer store beyond the 90-day limit, this is a plausible request.

RECEIVED
3/08/83

We have also sent a letter to IEPA (Mr. Greg Zak) in Springfield, conveying the same information as presented to you.

Please advise at your earliest convenience as to the assistance you can provide.

Sincerely yours,

CENTRAL QUALITY INDUSTRIES, INC.

Robert D. Hewes
Vice President - Manufacturing

RDH:ms

USEPA ID No. ILD 005176441
IEPA Generator No. 1410450001 G
IEPA Facility No. None

NOTE: Per letter dated June 16, 1982, from Region V, Central Quality has interim status as a hazardous waste facility.

ENC. #3-A

PHASE I
TEST DATA
JAN. 1984

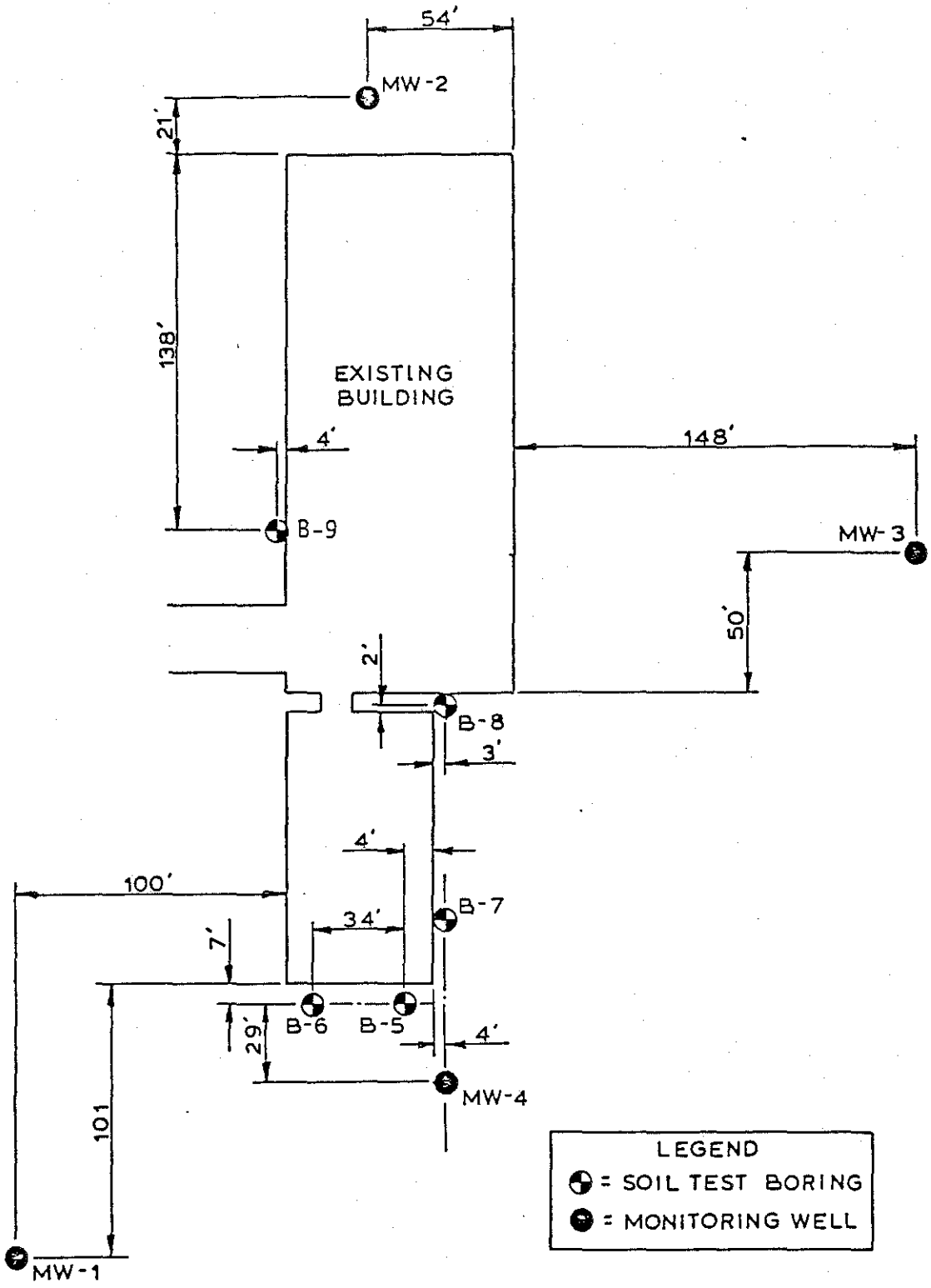
APPENDIX A

Monitoring Well and Soil Boring Location Diagram

Central Quality Industries, Inc.
Polo, Illinois

PHASE I

APPENDIX A



NO SCALE

MONITORING WELL AND SOIL BORING LOCATION DIAGRAM
CENTRAL QUALITY INDUSTRIES
POLO, ILLINOIS

Terracon Consultants, Inc.
Cedar Falls Cedar Rapids Davenport Des Moines, IA
Kansas City Wichita, KS
Oklahoma City Tulsa, OK

	DJW	12/6/83	783563

APPENDIX B

Water Sample Analysis

Date: January 12, 1984

SUBURBAN LABORATORIES, Inc.

CHEMICAL ANALYSTS SINCE 1936

4140 LITT DRIVE • Phone 312/544-3260 • HILLSIDE, ILLINOIS 60162

Certifications: U.S.D.A. #1783 • Ill. Dept. of Public Health #17135 • Amer. Spice Trade Assn. • F.D.A. Reg. #50296 • Ill. EPA #100191

ANALYSIS REPORT

NO. 11661, 11662, 11663

PRELIMINARY

John Yates & Associates
Attn: Mr. John Yates
320 South Sunset Avenue
La Grange, Illinois 60525

P.O. No. _____

Sample Recd. 12/27/83 Tests Completed 1/11/84

SAMPLE INFORMATION

Source Re: Mr. Dave Cook, Terracon Consultants, P.O. Box #2025, Davenport, IA 52809 Job #783563

S/L #11661 - Upstream 1A & 1B, Composite plus 1C, 11:12 AM, Polo, IL, 12/20/83
S/L #11662 - Downstream 2A & 2B, Composite plus 2C, 10:55 AM, Polo, IL, 12/20/83
S/L #11663 - MW - 1A & LB, Composite plus 1C, 11:18 AM, Polo, IL, 12/20/83

Sampling Method: By Client X By Sub. Lab. _____ Serco Auto-Sampler _____ Other _____

ANALYSIS

	#11661	#11662	#11663		#11661	#11662	#11663
Total Solids mg/l				Nitrogen-Tot mg/l			
Fix. Tot. Sol. mg/l				Nitrogen-Amm mg/l			
Vol. Tot. Sol. mg/l				Nitrogen-Org mg/l			
Diss. Solids mg/l	256	700	1028	Nitrite mg/l			
Settle. Sol. ml/l				Nitrate mg/l			
Tot. Sus. Sol. mg/l				Phosphate (Total) mg/l			
Fix. Sus. Sol. mg/l				Phosphate (Ortho) mg/l			
Vol. Sus. Sol. mg/l				Sulfate mg/l			
				Sulfide mg/l			
BOD mg/l				Sulfite mg/l			
COD mg/l	2249	76	83	Aluminum mg/l			
DO mg/l				Antimony mg/l			
				Arsenic mg/l			
Phenols ug/l				Barium mg/l			
MBAS mg/l				Beryllium mg/l			
Oils & Greases mg/l				Boron mg/l			
				Cadmium mg/l			
Tot. Bact. Cells/100 ml				Calcium mg/l			
Tot. Coli. Cells/100 ml				Chrom-Total mg/l	/ 0.10	/ 0.10	/ 0.10
Fecal Coli. Cells/100 ml				Chrom-Hex. mg/l			
				Chrom-Tri. mg/l			
pH	7.4	7.2	7.3	Copper mg/l			
Spec. Cond. umhos/cm				Iron mg/l			
Alkalinity mg/l as $CaCO_3$	332	466	393	Lead mg/l	/ 0.10	0.81	/ 0.10
Acidity mg/l as $CaCO_3$				Lithium mg/l			
Tot. Hard. mg/l as $CaCO_3$				Magnesium mg/l			
Resid. Cl_2 mg/l				Manganese mg/l			
Bromide mg/l				Mercury ug/l			
Chloride mg/l				Nickel mg/l			
Fluoride mg/l				Potassium mg/l			
Cyanide-Total mg/l				Silver mg/l			
ide-Free mg/l				Sodium mg/l			
Xylene mg/l	/ 0.2	/ 0.2	/ 0.2	Strontium mg/l			
				Tin mg/l			
				Zinc mg/l			

Our methods are in accordance with the American Public Health Association, Standard Methods 15th Edition.

ANALYSIS CERTIFIED BY _____, Director Date 1/12/84 ak

Appendix B-1

SUBURBAN LABORATORIES, Inc.

CHEMICAL ANALYSTS SINCE 1936

4140 LITT DRIVE • Phone 312/544-3260 • HILLSIDE, ILLINOIS 60162

Certifications: U.S.D.A. #1783 • Ill. Dept. of Public Health #17135 • Amer. Spice Trade Assn. • F.D.A. Reg. #50296 • Ill. EPA #100191

ANALYSIS REPORT

NO. 11664, 11665, 11666

12MAR84

John Yates & Associates
Attn: Mr. John Yates
320 South Sunset Avenue
La Grange, Illinois 60525

P.O. No. _____

Sample Recd. 12/27/83 Tests Completed 1/11/84

SAMPLE INFORMATION

Source Re: Mr. Dave Cook, Terracon Consultants, P.O. Box #2025, Davenport, IA 52809 Job #783563

S/L #11664 - MW - 2A & 2B, Composite plus MW-2C, 10:17 AM, Polo, IL, 12/20/83
S/L #11665 - MW - 3A & 3B, Composite plus MW-3C, 10:35 AM, Polo, IL, 12/20/83
S/L #11666 - MW - 4A & 4B, Composite plus MW-4C, 11:00 AM, Polo, IL. 12/20/83

Sampling Method: By Client X By Sub. Lab. _____ Serco Auto-Sampler _____ Other _____

ANALYSIS

	#11664	#11665	#11666		#11664	#11665	#11666
Total Solids mg/l				Nitrogen-Tot mg/l			
Fix. Tot. Sol. mg/l				Nitrogen-Amm mg/l			
Vol. Tot. Sol. mg/l				Nitrogen-Org mg/l			
Diss. Solids mg/l	656	592	816	Nitrite mg/l			
Settle. Sol. ml/l				Nitrate mg/l			
Tot. Sus. Sol. mg/l				Phosphate (Total) mg/l			
Fix. Sus. Sol. mg/l				Phosphate (Ortho) mg/l			
Vol. Sus. Sol. mg/l				Sulfate mg/l			
				Sulfide mg/l			
BOD mg/l				Sulfite mg/l			
COD mg/l	54	57	100	Aluminum mg/l			
DO mg/l				Antimony mg/l			
				Arsenic mg/l			
Phenols ug/l				Barium mg/l			
MBAS mg/l				Beryllium mg/l			
Oils & Greases mg/l				Boron mg/l			
				Cadmium mg/l			
Tot. Bact. Cells/100 ml				Calcium mg/l			
Tot. Coli. Cells/100 ml				Chrom-Total mg/l	/ 0.10	/ 0.10	/ 0.10
Fecal Coli. Cells/100 ml				Chrom-Hex. mg/l			
				Chrom-Tri. mg/l			
pH	7.5	7.4	7.1	Copper mg/l			
Spec. Cond. umhos/cm				Iron mg/l			
Alkalinity mg/l as $CaCO_3$	397	303	554	Lead mg/l	/ 0.10	0.12	0.34
Acidity mg/l as $CaCO_3$				Lithium mg/l			
Tot. Hard. mg/l as $CaCO_3$				Magnesium mg/l			
Resid. Cl_2 mg/l				Manganese mg/l			
Bromide mg/l				Mercury ug/l			
Chloride mg/l				Nickel mg/l			
Fluoride mg/l				Potassium mg/l			
Cyanide-Total mg/l				Silver mg/l			
ide-Free mg/l				Sodium mg/l			
Xylene mg/l	/ 0.2	/ 0.2	/ 0.2	Strontium mg/l			
				Tin mg/l			
				Zinc mg/l			

Appendix B-1
Page 2

Our methods are in accordance with the American Public Health Association, Standard Methods 15th Edition.

ANALYSIS CERTIFIED BY _____, Director Date 1/12/84 ak

APPENDIX B-2

Water Sample Analysis

Date: January 26, 1984

SUBURBAN LABORATORIES, Inc.

CHEMICAL ANALYSTS SINCE 1936

4140 LITT DRIVE • Phone 312/544-3260 • HILLSIDE, ILLINOIS 60162

Certifications: U.S.D.A. #1783 • Ill. Dept. of Public Health #17135 • Amer. Spice Trade Assn. • F.D.A. Reg. #50296 • Ill. EPA #100191

ANALYSIS REPORT

NO. 11664, 11665, 11666

John Yates & Associates
Attn: Mr. John Yates
320 South Sunset Avenue
La Grange, Illinois 60525

P.O. No. _____

Sample Recd. 12/27/83 Tests Completed 1/11/84

SAMPLE INFORMATION

Source Re: Mr. Dave Cook, Terracon Consultants, P.O. Box #2025, Davenport, IA 52809 Job #783563

S/L #11664 - MW - 2A & 2B, Composite plus MW-2C, 10:17 AM, Polo, IL., 12/20/83
S/L #11665 - MW - 3A & 3B, Composite plus MW-3C, 10:35 AM, Polo, IL., 12/20/83
S/L #11666 - MW - 4A & 4B, Composite plus MW-4C, 11:00 AM, Polo, IL., 12/20/83

Sampling Method: By Client X By Sub. Lab. _____ Serco Auto-Sampler _____ Other _____

ANALYSIS

	#11664	#11665	#11666
Total Solids mg/l			
Fix. Tot. Sol. mg/l			
Vol. Tot. Sol. mg/l			
Diss. Solids mg/l	656	592	816
Settle. Sol. ml/l			
Tot. Sus. Sol. mg/l			
Fix. Sus. Sol. mg/l			
Vol. Sus. Sol. mg/l			
BOD mg/l			
COD mg/l	54	57	100
DO mg/l			
Phenols ug/l			
MBAS mg/l			
Oils & Greases mg/l			
Tot. Bact. Cells/100 ml			
Tot. Coli. Cells/100 ml			
Fecal Coli. Cells/100 ml			
pH	7.5	7.4	7.1
Spec. Cond. umhos/cm			
Alkalinity mg/l as $CaCO_3$	397	303	354
Acidity mg/l as $CaCO_3$			
Tot. Hard. mg/l as $CaCO_3$			
Resid. Cl_2 mg/l			
Bromide mg/l			
Chloride mg/l			
Fluoride mg/l			
Cyanide-Total mg/l			
Cyanide-Free mg/l			
Xylene mg/l	/ 0.2	/ 0.2	/ 0.2

	#11664	#11665	#11666
Nitrogen-Tot mg/l			
Nitrogen-Amm mg/l			
Nitrogen-Org mg/l			
Nitrite mg/l			
Nitrate mg/l			
Phosphate (Total) mg/l			
Phosphate (Ortho) mg/l			
Sulfate mg/l			
Sulfide mg/l			
Sulfite mg/l			
Aluminum mg/l			
Antimony mg/l			
Arsenic mg/l			
Barium mg/l			
Beryllium mg/l			
Boron mg/l			
Cadmium mg/l			
Calcium mg/l			
Chrom-Total mg/l	0.023	0.086	0.073
Chrom-Hex. mg/l			
Chrom-Tri. mg/l			
Copper mg/l			
Iron mg/l			
Lead mg/l	0.024	0.038	0.324
Lithium mg/l			
Magnesium mg/l			
Manganese mg/l			
Mercury ug/l			
Nickel mg/l			
Potassium mg/l			
Silver mg/l			
Sodium mg/l			
Strontium mg/l			
Tin mg/l			
Zinc mg/l			

Our methods are in accordance with the American Public Health Association, Standard Methods 15th Edition.

ANALYSIS CERTIFIED BY _____ Retyped Date 1/26/84 ab

Appendix B-2
Page 1

SUBURBAN LABORATORIES, Inc.

CHEMICAL ANALYSTS SINCE 1936

4140 LITT DRIVE • Phone 312/544-3260 • HILLSIDE, ILLINOIS 60162

Certifications: U.S.D.A. #1783 • Ill. Dept. of Public Health #17135 • Amer. Spice Trade Assn. • F.D.A. Reg. #50296 • Ill. EPA #100191

NO. 11661, 11662, 11663

n Yates & Associates
n: Mr. John Yates
320 South Sunset Avenue
La Grange, Illinois 60525

P.O. No. _____

ple Recd. 12/27/83 Tests Completed 1/11/84

SAMPLE INFORMATION

rce Re: Mr. Dave Cook, Terracon Consultants, P.O. Box #2025, Davenport, IA 52809 Job #783563

S/L #11661 - Upstream 1A & 1B, Composite plus 1C, 11:12 AM, Polo, IL., 12/20/83
S/L #11662 - Downstream 2A & 2B, Compsoite plus 2C, 10:55 AM, Polo, IL, 12/20/83
S/L #11663 - MW - 1A &1B, Composite plus 1C, 11:18 AM, Polo, IL, 12/20/83

ipling Method: By Client X By Sub. Lab. _____ Serco Auto-Sampler _____ Other _____

ANALYSIS

		#11661	#11662	#11663
tal Solids	mg/l			
x. Tot. Sol.	mg/l			
l. Tot. Sol.	mg/l			
ss. Solids	mg/l	256	700	1028
ttle. Sol.	ml/l			
t. Sus. Sol.	mg/l			
x. Sus. Sol.	mg/l			
l. Sus. Sol.	mg/l			
OD	mg/l			
OD	mg/l	2249	76	83
	mg/l			
enols	ug/l			
BAS	mg/l			
ils & Greases	mg/l			
ot. Bact.	Cells/100 ml			
ot. Coli.	Cells/100 ml			
ecal Coli.	Cells/100 ml			
H		7.4	7.2	7.3
pec. Cond.	umhos/cm			
lkalinity	mg/l as $CaCO_3$	332	466	393
cidity	mg/l as $CaCO_3$			
ot. Hard.	mg/l as $CaCO_3$			
esid. Cl_2	mg/l			
romide	mg/l			
hloride	mg/l			
luoride	mg/l			
yani Total	mg/l			
yan Free	mg/l			
ylene	mg/l	< 0.2	< 0.2	< 0.2

		#11661	#11662	#11663
Nitrogen-Tot	mg/l			
Nitrogen-Amm	mg/l			
Nitrogen-Org	mg/l			
Nitrite	mg/l			
Nitrate	mg/l			
Phosphate (Total)	mg/l			
Phosphate (Ortho)	mg/l			
Sulfate	mg/l			
Sulfide	mg/l			
Sulfite	mg/l			
Aluminum	mg/l			
Antimony	mg/l			
Arsenic	mg/l			
Barium	mg/l			
Beryllium	mg/l			
Boron	mg/l			
Cadmium	mg/l			
Calcium	mg/l			
Chrom-Total	mg/l	0.035	0.088	0.020
Chrom-Hex.	mg/l			
Chrom-Tri.	mg/l			
Copper	mg/l			
Iron	mg/l			
Lead	mg/l	0.046	1.02	0.09
Lithium	mg/l			
Magnesium	mg/l			
Manganese	mg/l			
Mercury	ug/l			
Nickel	mg/l			
Potassium	mg/l			
Silver	mg/l			
Sodium	mg/l			
Strontium	mg/l			
Tin	mg/l			
Zinc	mg/l			

Appendix B-2
Page 2

Our methods are in accordance with the American Public Health Association, Standard Methods 15th Edition.

Retyped

NALYSIS CERTIFIED BY: _____, Director Date: 1/26/84

APPENDIX C

Soil Sample Analysis

SUBURBAN LABORATORIES, Inc.

CHEMICAL ANALYSTS SINCE 1936

4140 LITT DRIVE • Phone 312/544-3260 • HILLSIDE, ILLINOIS 60162

Certifications: U.S.D.A. #1783 • Ill. Dept. of Public Health #17135 • Amer. Spice Trade Assn. • F.D.A. Reg. #50296 • Ill. EPA #100191

ANALYSIS REPORT

NO. 11637

John Yates & Associates
Attn: Mr. John Yates
320 South Sunset Avenue
La Grange, Illinois 60525

P.O. No.

Sample Recd. 12/23/83 Tests Completed 1/11/84

SAMPLE INFORMATION

Source Re: Mr. Dave Cook, Terracon Consultants, P.O. Box #2025, Davenport, IA 52809 Job #783563

S/L #11637 - Composite Soil - Boring #5, Sample #1, Depth 0.5-1.5
Boring #5, Sample #2, Depth 2.0-3.0
Boring #5, Sample #3, Depth 3.5-4.5

Sampling Method: By Client X By Sub. Lab. Serco Auto-Sampler Other

ANALYSIS

	#11637				#11637		
Total Solids mg/l				Nitrogen-Tot mg/l			
Fix. Tot. Sol. mg/l				Nitrogen-Amm mg/l			
Vol. Tot. Sol. mg/l				Nitrogen-Org mg/l			
Diss. Solids mg/l				Nitrite mg/l			
Settle. Sol. ml/l				Nitrate mg/l			
Tot. Sus. Sol. mg/l				Phosphate (Total) mg/l			
Fix. Sus. Sol. mg/l				Phosphate (Ortho) mg/l			
Vol. Sus. Sol. mg/l				Sulfate mg/l			
				Sulfide mg/l			
BOD mg/l				Sulfite mg/l			
COD mg/l				Aluminum mg/l			
DO mg/l				Antimony mg/l			
				Arsenic mg/l	0.020		
Phenols ug/l				Barium mg/l	1.0		
MBAS mg/l				Beryllium mg/l			
Oils & Greases mg/l				Boron mg/l			
				Cadmium mg/l	/ 0.10		
Tot. Bact. Cells/100 ml				Calcium mg/l			
Tot. Coli. Cells/100 ml				Chrom-Total mg/l	/ 0.10		
Fecal Coli. Cells/100 ml				Chrom-Hex. mg/l			
				Chrom-Tri. mg/l			
pH	6.8			Copper mg/l			
Spec. Cond. umhos/cm				Iron mg/l			
Alkalinity ppm as $CaCO_3$	930			Lead mg/l	/ 0.10		
Acidity mg/l as $CaCO_3$				Lithium mg/l			
Tot. Hard. mg/l as $CaCO_3$				Magnesium mg/l			
Resid. Cl_2 mg/l				Manganese mg/l			
Bromide mg/l				Mercury mg/l	/ 0.0001		
Chloride mg/l				Nickel mg/l			
Fluoride mg/l				Potassium mg/l			
Cyanide-Total mg/l				Silver mg/l	/ 0.10		
Cyanide-Free mg/l				Sodium mg/l			
Xylene (Raw) ppm	2.3			Strontium mg/l			
				Selenium mg/l	0.022		
				Zinc mg/l			

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Our methods are in accordance with the American Public Health Association, Standard Methods 15th Edition.

Director Date: 1/12/84 ak

SUBURBAN LABORATORIES, Inc.

CHEMICAL ANALYSTS SINCE 1936

4140 LITT DRIVE • Phone 312/544-3260 • HILLSIDE, ILLINOIS 60162

Certifications: U.S.D.A. #1783 • Ill. Dept. of Public Health #17135 • Amer. Spice Trade Assn. • F.D.A. Reg. #50296 • Ill. EPA #100191

ANALYSIS REPORT NO. 11638

Jo[illegible] Yates & Associates
Attn: Mr. John Yates
320 South Sunset Avenue
La Grange, Illinois 60525

P.O. No. _____

e Recd. 12/23/83 Tests Completed 1/11/84

SAMPLE INFORMATION

Re: Mr. Dave Cook, Terracon Consultants, P.O. Box #2025, Davenport, IA 52809 Job #783563

Source: S/L #11638 - Soil Composite - Boring #6, Sample #1, Depth 0.5-1.5
Boring #6, Sample #2, Depth 2.0-3.0
Boring #6, Sample #3, Depth 3.5-4.5

ing Method: By Client X By Sub. Lab. _____ Serco Auto-Sampler _____ Other _____

ANALYSIS

							E.P. Toxicity #11638	
l Solids	mg/l				Nitrogen-Tot	mg/l		
Tot. Sol.	mg/l				Nitrogen-Amm	mg/l		
Tot. Sol.	mg/l				Nitrogen-Org	mg/l		
. Solids	mg/l				Nitrite	mg/l		
le. Sol.	ml/l				Nitrate	mg/l		
. Sus. Sol.	mg/l				Phosphate (Total)	mg/l		
. Sus. Sol.	mg/l				Phosphate (Ortho)	mg/l		
. Sus. Sol.	mg/l				Sulfate	mg/l		
					Sulfide	mg/l		
)	mg/l				Sulfite	mg/l		
)	mg/l				Aluminum	mg/l		
	mg/l				Antimony	mg/l		
					Arsenic	mg/l	0.012	
nols	ug/l				Barium	mg/l	1.6	
S	mg/l				Beryllium	mg/l		
& Greases	mg/l				Boron	mg/l		
					Cadmium	mg/l	/ 0.10	
. Bact.	Cells/100 ml				Calcium	mg/l		
. Coli.	Cells/100 ml				Chrom-Total	mg/l	/ 0.10	
al Coli.	Cells/100 ml				Chrom-Hex.	mg/l		
					Chrom-Tri.	mg/l		
		7.6			Copper	mg/l		
c. Cond.	umhos/cm				Iron	mg/l		
alinity	ppm as $CaCO_3$	1731			Lead	mg/l	/ 0.10	
dity	mg/l as $CaCO_3$				Lithium	mg/l		
. Hard.	mg/l as $CaCO_3$				Magnesium	mg/l		
id. Cl_2	mg/l				Manganese	mg/l		
mide	mg/l				Mercury	mg/l	/ 0.0001	
oride	mg/l				Nickel	mg/l		
arid	mg/l				Potassium	mg/l		
nide stal	mg/l				Silver	mg/l	/ 0.10	
anide-Free	mg/l				Sodium	mg/l		
					Strontium	mg/l		
					Selenium	mg/l	0.006	
					Zinc	mg/l		

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Our methods are in accordance with the American Public Health Association, Standard Methods 15th Edition.

[signature]

1/12/84

SUBURBAN LABORATORIES, Inc.

CHEMICAL ANALYSTS SINCE 1936

NO. 11639

4140 LITT DRIVE • Phone 312/544-3260 • HILLSIDE, ILLINOIS 60162

Certifications: U.S.D.A. #1783 • Ill. Dept. of Public Health #17135 • Amer. Spice Trade Assn. • F.D.A. Reg. #50296 • Ill. EPA #100191

John Yates & Associates
Attn: Mr. John Yates
320 South Sunset Avenue
La Grange, Illinois 60525

P.O. No.

Sample Recd. 12/23/83 Tests Completed 1/11/84

SAMPLE INFORMATION

Source Re: Mr. Dave Cook, Terracon Consultants, P.O. Box #2025, Davenport, IA 52809 Job #783563

Source: S/L #11639 - Composite - Soil - Boring #7, Sample #1, Depth 0.5-1.5
Boring #7, Sample #2, Depth 2.0-3.0
Boring #7, Sample #3, Depth 3.5-4.5

Sampling Method: By Client X By Sub. Lab. Serco Auto-Sampler Other

ANALYSIS — E.P. Toxicity

						#11639		
Total Solids	mg/l			Nitrogen-Tot	mg/l			
Fix. Tot. Sol.	mg/l			Nitrogen-Amm	mg/l			
Vol. Tot. Sol.	mg/l			Nitrogen-Org	mg/l			
Diss. Solids	mg/l			Nitrite	mg/l			
Settle. Sol.	ml/l			Nitrate	mg/l			
Tot. Sus. Sol.	mg/l			Phosphate (Total)	mg/l			
Fix. Sus. Sol.	mg/l			Phosphate (Ortho)	mg/l			
Vol. Sus. Sol.	mg/l			Sulfate	mg/l			
				Sulfide	mg/l			
BOD	mg/l			Sulfite	mg/l			
COD	mg/l			Aluminum	mg/l			
OO	mg/l			Antimony	mg/l			
				Arsenic	mg/l	0.011		
Phenols	ug/l			Barium	mg/l	1.2		
MBAS	mg/l			Beryllium	mg/l			
Oils & Greases	mg/l			Boron	mg/l			
				Cadmium	mg/l	/ 0.10		
Tot. Bact.	Cells/100 ml			Calcium	mg/l			
Tot. Coli.	Cells/100 ml			Chrom-Total	mg/l	/ 0.10		
Fecal Coli.	Cells/100 ml			Chrom-Hex.	mg/l			
				Chrom-Tri.	mg/l			
pH		6.6		Copper	mg/l			
Spec. Cond.	umhos/cm			Iron	mg/l			
Alkalinity	ppm as $CaCO_3$	633		Lead	mg/l	/ 0.10		
Acidity	mg/l as $CaCO_3$			Lithium	mg/l			
Tot. Hard.	mg/l as $CaCO_3$			Magnesium	mg/l			
Resid. Cl_2	mg/l			Manganese	mg/l			
Bromide	mg/l			Mercury	mg/l	/ 0.0001		
Chloride	mg/l			Nickel	mg/l			
Fluoride	mg/l			Potassium	mg/l			
Cyanide - Total	mg/l			Silver	mg/l	/ 0.10		
Cyanide-Free	mg/l			Sodium	mg/l			
				Strontium	mg/l			
				Selenium	mg/l	0.003		
				Zinc	mg/l			

Our methods are in accordance with the American Public Health Association, Standard Methods 15th Edition.

1/12/84 ak

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SUBURBAN LABORATORIES, Inc.

CHEMICAL ANALYSTS SINCE 1936

4140 LITT DRIVE • Phone 312/544-3260 • HILLSIDE, ILLINOIS 60162

Certifications: U.S.D.A. #1783 • Ill. Dept. of Public Health #17135 • Amer. Spice Trade Assn. • F.D.A. Reg. #50296 • Ill. EPA #100191

ANALYSIS REPORT

NO. 11640

John Yates & Associates
Attn: Mr. John Yates
320 South Sunset Avenue
La Grange, Illinois 60525

P.O. No. _____

Sample Recd. 12/23/83 Tests Completed 1/11/84

SAMPLE INFORMATION

Source Re: Mr. Dave Cook, Terracon Consultants, P.O. Box #2025, Davenport, IA 52809 Job #783563

S/L #11640 - Composite - Boring #8, Sample #1, Depth 0.5-1.5
Boring #8, Sample #2, Depth 2.0-3.0
Boring #8, Sample #3, Depth 3.5-4.5

Sampling Method: By Client X By Sub. Lab. _____ Serco Auto-Sampler _____ Other _____

ANALYSIS — E.P. Toxicity

					#11640
Total Solids	mg/l		Nitrogen-Tot	mg/l	
Fix. Tot. Sol.	mg/l		Nitrogen-Amm	mg/l	
Vol. Tot. Sol.	mg/l		Nitrogen-Org	mg/l	
Diss. Solids	mg/l		Nitrite	mg/l	
Settle. Sol.	ml/l		Nitrate	mg/l	
Tot. Sus. Sol.	mg/l		Phosphate (Total)	mg/l	
Fix. Sus. Sol.	mg/l		Phosphate (Ortho)	mg/l	
Vol. Sus. Sol.	mg/l		Sulfate	mg/l	
			Sulfide	mg/l	
BOD	mg/l		Sulfite	mg/l	
COD	mg/l		Aluminum	mg/l	
DO	mg/l		Antimony	mg/l	
			Arsenic	mg/l	0.008
Phenols	ug/l		Barium	mg/l	/ 1.0
MBAS	mg/l		Beryllium	mg/l	
Oils & Greases	mg/l		Boron	mg/l	
			Cadmium	mg/l	/ 0.10
Tot. Bact.	Cells/100 ml		Calcium	mg/l	
Tot. Coli.	Cells/100 ml		Chrom-Total	mg/l	/ 0.10
Fecal Coli.	Cells/100 ml		Chrom-Hex.	mg/l	
			Chrom-Tri.	mg/l	
pH		7.0	Copper	mg/l	
Spec. Cond.	umhos/cm		Iron	mg/l	
Alkalinity ppm	as $CaCO_3$	592	Lead	mg/l	/ 0.10
Acidity	mg/l as $CaCO_3$		Lithium	mg/l	
Tot. Hard.	mg/l as $CaCO_3$		Magnesium	mg/l	
Resid. Cl_2	mg/l		Manganese	mg/l	
Bromide	mg/l		Mercury	mg/l	/ 0.0001
Chloride	mg/l		Nickel	mg/l	
Fluoride	mg/l		Potassium	mg/l	
Cyanide-Total	mg/l		Silver	mg/l	/ 0.10
Cyanide-Free	mg/l		Sodium	mg/l	
			Strontium	mg/l	
			Selenium	mg/l	0.027
			Zinc	mg/l	

Our methods are in accordance with the American Public Health Association, Standard Methods 15th Edition.

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SUBURBAN LABORATORIES, Inc.

CHEMICAL ANALYSTS SINCE 1936

4140 LITT DRIVE • Phone 312/544-3260 • HILLSIDE, ILLINOIS 60162

Certifications: U.S.D.A. #1783 • Ill. Dept. of Public Health #17135 • Amer. Spice Trade Assn. • F.D.A. Reg. #50298 • Ill. EPA #100191

ANALYSIS REPORT

NO. 11641

...hn Yates & Associates
...ttn: Mr. John Yates
320 South Sunset Avenue
La Grange, Illinois 60525

P.O. No. _____

...mple Recd. 12/23/83 Tests Completed 1/11/84

SAMPLE INFORMATION

...urce Re: Mr. Dave Cook, Terracon Consultants, P.O. Box #2025, Davenport, IA 52809 Job #783563

S/L #11641 - Composite - Boring #9, Sample #1, Depth 0.5-1.5
Boring #9, Sample #2, Depth 2.0-3.0
Boring #9, Sample #3, Depth 3.5-4.5

...mpling Method: By Client X By Sub. Lab. _____ Serco Auto-Sampler _____ Other _____

ANALYSIS — E.P. Toxicity

						#11641		
...otal Solids	mg/l				Nitrogen-Tot	mg/l		
...ix. Tot. Sol.	mg/l				Nitrogen-Amm	mg/l		
...ol. Tot. Sol.	mg/l				Nitrogen-Org	mg/l		
...iss. Solids	mg/l				Nitrite	mg/l		
...ettle. Sol.	ml/l				Nitrate	mg/l		
...Tot. Sus. Sol.	mg/l				Phosphate (Total)	mg/l		
...Fix. Sus. Sol.	mg/l				Phosphate (Ortho)	mg/l		
...Vol. Sus. Sol.	mg/l				Sulfate	mg/l		
					Sulfide	mg/l		
...BOD	mg/l				Sulfite	mg/l		
...COD	mg/l				Aluminum	mg/l		
...DO	mg/l				Antimony	mg/l		
					Arsenic	mg/l	0.003	
...Phenols	ug/l				Barium	mg/l	/ 1.0	
...MBAS	mg/l				Beryllium	mg/l		
...Oils & Greases	mg/l				Boron	mg/l		
					Cadmium	mg/l	/ 0.10	
...Tot. Bact.	Cells/100 ml				Calcium	mg/l		
...Tot. Coli.	Cells/100 ml				Chrom-Total	mg/l	/ 0.10	
...Fecal Coli.	Cells/100 ml				Chrom-Hex.	mg/l		
					Chrom-Tri.	mg/l		
...pH		6.4			Copper	mg/l		
...Spec. Cond.	umhos/cm				Iron	mg/l		
...Alkalinity	ppm as $CaCO_3$	476			Lead	mg/l	/ 0.10	
...Acidity	mg/l as $CaCO_3$				Lithium	mg/l		
...Tot. Hard.	mg/l as $CaCO_3$				Magnesium	mg/l		
...Resid. Cl_2	mg/l				Manganese	mg/l		
...Bromide	mg/l				Mercury	mg/l	/ 0.0001	
...Chloride	mg/l				Nickel	mg/l		
...Fluoride	mg/l				Potassium	mg/l		
...Cyan... Total	mg/l				Silver	mg/l	/ 0.10	
...Cyan... Free	mg/l				Sodium	mg/l		
					Strontium	mg/l		
					Selenium	mg/l	0.026	
					Zinc	mg/l		

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Our methods are in accordance with the American Public Health Association, Standard Methods 15th Edition.

ANALYSIS CERTIFIED BY _____, Director Date 1/12/84 ak

ENC # 3-B

PHASE II
TEST DATA
MAY 1984

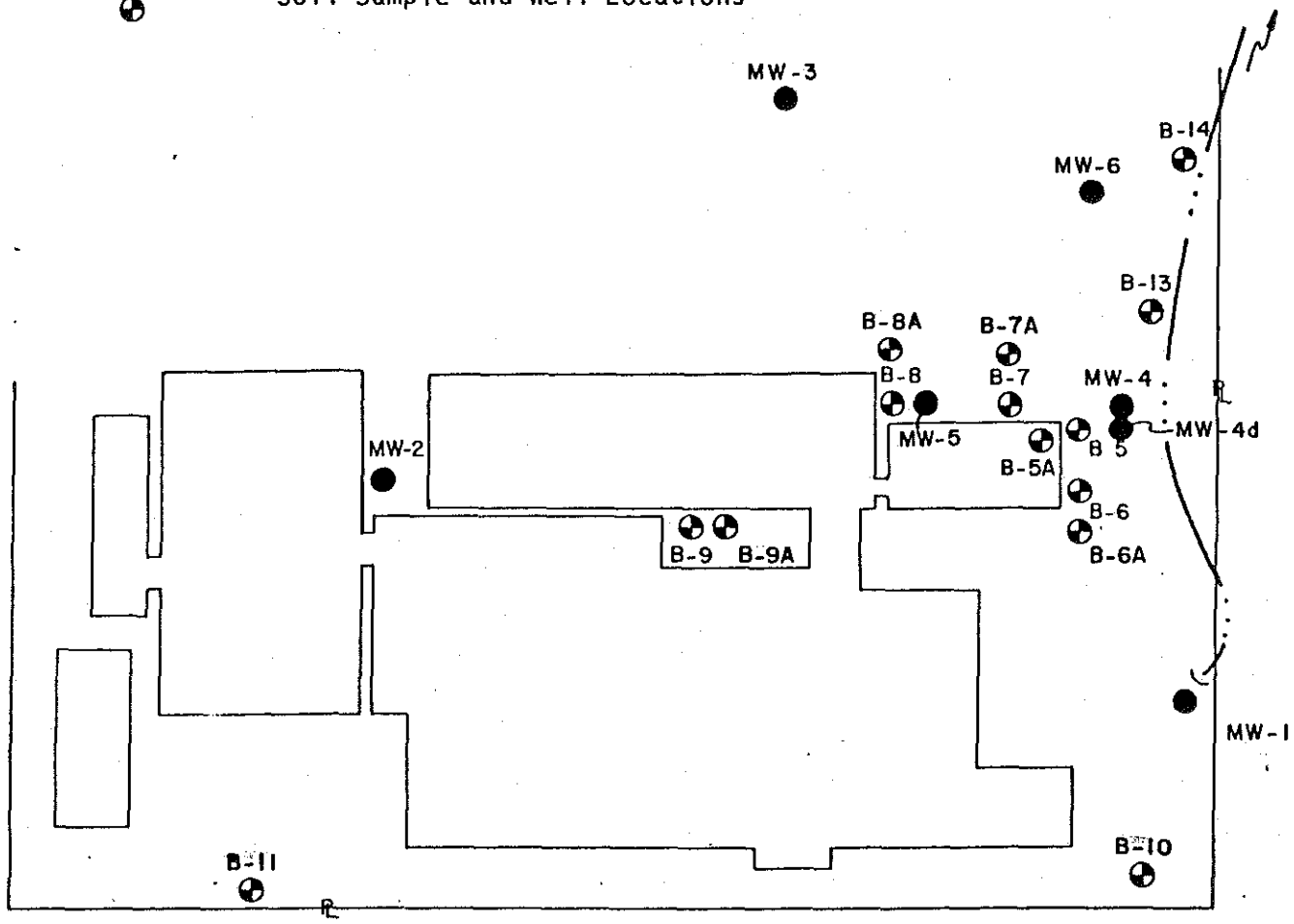
APPENDIX A

Drilling and Monitoring

Well Information

GRAPH V

Soil Sample and Well Locations



N

Scale 1" = 100'

Date 2-14-84

Drawn By J.M.

Boring

Monitoring Well

Ditch

M. Rapps Associates
Environmental Engineering

PHASE II

Soil Sample
&
Well Locations

APPENDIX B

Soil Sampling

Analysis Results

SOIL SAMPLES
EP-TOX

Telephone (312) 544-3260

SUBURBAN LABORATORIES, Inc.

4140 LITT DRIVE HILLSIDE, ILLINOIS 60162 - 1183

EARL I. ROSENBERG
President

H.R. THOMAS, JR.
Director

June 1, 1984

John Yates & Associates
320 South Sunset Avenue
La Grange, Illinois 60525

Attention: Mr. John Yates

Re: Terracon Consultants, Inc.
Davenport, Iowa - Soil Samples

Samples Received: 4/25/84	pH	Lead (ppm)	(ppm) Chrom-Total	(ppm as $CaCO_3$) Alkalinity
S/L #4350 - Sample #B5A-1	7.6	< 0.10	< 0.10	1086
S/L #4351 - Sample #B5A-2	7.1	< 0.10	< 0.10	1809
S/L #4352 - Sample #B5A-3	6.9	< 0.10	< 0.10	1428
S/L #4353 - Sample #B6A-1	8.1	< 0.10	< 0.10	7118
S/L #4354 - Sample #B6A-2	8.3	< 0.10	< 0.10	20725
S/L #4355 - Sample #B6A-3	8.1	< 0.10	< 0.10	2276
S/L #4356 - Sample #B7A-1	7.8	< 0.10	< 0.10	3619
S/L #4357 - Sample #B7A-2	6.85	< 0.10	< 0.10	1130
S/L #4358 - Sample #B7A-3	6.5	< 0.10	< 0.10	1010
S/L #4359 - Sample #B-10-1	8.3	< 0.10	< 0.10	19268
S/L #4360 - Sample #B-10-2	7.4	< 0.10	< 0.10	4540
S/L #4361 - Sample #B-10-3	7.3	< 0.10	< 0.10	2642
S/L #4362 - Sample #B-11-1	7.3	< 0.10	< 0.10	1761
S/L #4363 - Sample #B-11-2	6.95	< 0.10	< 0.10	1015
S/L #4364 - Sample #B-11-3	8.0	< 0.10	< 0.10	19034
S/L #4365 - Sample #B-12-1	7.5	< 0.10	< 0.10	1046
S/L #4366 - Sample #B-12-2	7.7	< 0.10	< 0.10	16526
S/L #4367 - Sample #B-12-3	7.9	< 0.10	< 0.10	19569
S/L #4368 - Sample #B-13-1	7.6	< 0.10	< 0.10	7112
S/L #4369 - Sample #B-13-2	7.5	< 0.10	< 0.10	2734
S/L #4370 - Sample #B-13-3	6.85	< 0.10	< 0.10	1323
S/L #4371 - Sample #8A-1-0-2	7.55	< 0.10	< 0.10	4148
S/L #4272- Sample #8A-2-2-3-5	6.5	< 0.10	< 0.10	1015
S/L #4373 - Sample #8A-3-3-5-5	6.6	< 0.10	< 0.10	907

(Continued)

Samples Received: 4/25/84	pH	Lead (ppm)	(ppm) Chrom-Total	(ppm as $CaCO_3$) Alkalinity
S/L #4374 - Sample #9A-1 0-2	7.4	< 0.10	< 0.10	2334
S/L #4375 - Sample #9A-2-2-3-5	5.3	< 0.10	< 0.10	404
S/L #4376 - Sample #9A-3-3-5-5	5.9	< 0.10	< 0.10	255
S/L #4377 - Sample #14-1 0-2	7.75	< 0.10	< 0.10	3640
S/L #4378 - Sample #14-2 2-3-5	7.4	< 0.10	< 0.10	1848
S/L #4379 - Sample #14-3 3-5-5	7.5	< 0.10	< 0.10	753

ANALYSIS CERTIFIED BY: _____, Director(HRT/ak)
Retyped

SOIL SAMPLES

Telephone (312) 544-3260

SUBURBAN LABORATORIES, Inc.

4140 LITT DRIVE HILLSIDE, ILLINOIS 60162 · 1183

EARL I. ROSENBERG
President

H.R. THOMAS, JR.
Director

May 10, 1984

John Yates & Associates
320 South Sunset Avenue
La Grange, Illinois 60525

Attention: Mr. John Yates

Re: Terracon Consultants, Inc.
Davenport, Iowa - Soil Samples

Samples Received: 4/25/84	pH	Lead (ppm)	(ppm) Chrom-Total	(ppm as $CaCO_3$) Alkalinity
S/L #4350 - Sample #B5A-1	7.6	21.0	15.0	1086
S/L #4351 - Sample #B5A-2	7.1	13.0	14.0	1809
S/L #4352 - Sample #B5A-3	6.9	12.5	16.5	1428
S/L #4353 - Sample #B6A-1	8.1	18.0	16.5	7118
S/L #4354 - Sample #B6A-2	8.3	66.5	31.5	20725
S/L #4355 - Sample #B6A-3	8.1	16.6	22.0	2276
S/L #4356 - Sample #B7A-1	7.8	60.5	23.0	3619
S/L #4357 - Sample #B7A-2	6.85	35.0	21.0	1130
S/L #4358 - Sample #B7A-3	6.5	16.5	22.0	1010
S/L #4359 - Sample #B-10-1	8.3	30.5	16.5	19268
S/L #4360 - Sample #B-10-2	7.4	15.5	15.5	4540
S/L #4361 - Sample #B-10-3	7.3	8.5	16.5	2642
S/L #4362 - Sample #B-11-1	7.3	69.0	18.5	1761
S/L #4363 - Sample #B-11-2	6.95	7.5	6.0	1015
S/L #4364 - Sample #B-11-3	8.0	14.5	17.0	19034
S/L #4365 - Sample #B-12-1	7.5	13.0	17.5	1046
S/L #4366 - Sample #B-12-2	7.7	12.0	9.00	16526
S/L #4367 - Sample #B-12-3	7.9	17.0	14.0	19569
S/L #4368 - Sample #B-13-1	7.6	455	91.0	7112
S/L #4369 - Sample #B-13-2	7.5	62.5	17.0	2734
S/L #4370 - Sample #B-13-3	6.85	44.5	16.5	1323
S/L #4371 - Sample #8A-1_0-2	7.55	32.5	610	4148
S/L #4372 - Sample #8A-2_2-3-5	6.5	8.5	6.0	1015
S/L #4373 - Sample #8A 3-3-5-5	6.6	12.0	14.5	907

(Continued)

Samples Received: 4/25/84		pH	Lead (ppm)	(ppm) Chrom-Total	(ppm as $CaCO_3$) Alkalinity
S/L #4374 - Sample #9A-1	0-2	7.4	39.0	20.5	2334
S/L #4375 - Sample #9A-2	2-3-5	5.3	14.5	16.5	404
S/L #4376 - Sample #9A-3	3-5-5	5.9	24.0	37.0	255
S/L #4377 - Sample #14-1	0-2	7.75	28.5	29.0	2640
S/L #4378 - Sample #14-2	2-3-5	7.4	14.5	12.0	1848
S/L #4379 - Sample #14-3	3-5-5	7.5	22.0	19.0	753

ANALYSIS CERTIFIED BY: _____, Director(HRT/ak)

APPENDIX E

Groundwater Sample Analysis Results

SUBURBAN LABORATORIES, Inc.

CHEMICAL ANALYSTS SINCE 1936

[illegible]0 LITT DRIVE • Phone 312/544-3260 • HILLSIDE, ILLINOIS 60162

[illegible]lifications: U.S.D.A. #1783 • Ill. Dept. of Public Health #17135 • Amer. Spice Trade Assn. • F.D.A. Reg. #50298 • Ill. EPA #100191

ANALYSIS REPORT

NO. #5432, #5433, #5434

John Yates & Associates
Attn: Mr. John Yates
320 South Sunset Avenue
La Grange, Illinois 60525

P.O. No. _____

[illegible]ple Recd. 5/22/84 Tests Completed 6/1 /84

SAMPLE INFORMATION

[illegible]rce Re: Terracon Consultants, P.O. Box #2025, Davenport, Ia. 52809, Job #78356-1

#5432 - #MW-1, Proj. Polo, 5/18/84
#5433 - #MW-2, Proj. Polo, 5/18/84
#5434 - #MW-3, Proj. Polo, 5/18/84 (+) by HGA

[illegible]pling Method: By Client X By Sub. Lab. _____ Serco Auto-Sampler _____ Other _____

ANALYSIS

	#5432	#5433	#5434		#5432	#5433	#5434
[illegible]tal Solids mg/l				Nitrogen-Tot mg/l			
[illegible]x. Tot. Sol. mg/l				Nitrogen-Amm mg/l			
[illegible]l. Tot. Sol. mg/l				Nitrogen-Org mg/l			
[illegible]ss. Solids mg/l	764	576	556	Nitrite mg/l			
[illegible]ttle. Sol. ml/l				Nitrate mg/l			
[illegible]t. Sus. Sol. mg/l				Phosphate (Total) mg/l			
[illegible]x. Sus. Sol. mg/l				Phosphate (Ortho) mg/l			
[illegible]l. Sus. Sol. mg/l				Sulfate mg/l			
				Sulfide mg/l			
[illegible]D mg/l				Sulfite mg/l			
[illegible]D mg/l	360	10	135	Aluminum mg/l			
[illegible] mg/l				Antimony mg/l			
				Arsenic mg/l			
[illegible]enols ug/l				Barium mg/l			
[illegible]AS mg/l				Beryllium mg/l			
[illegible]ls & Greases mg/l				Boron mg/l			
				Cadmium mg/l			
[illegible]t. Bact. Cells/100 ml				Calcium mg/l			
[illegible]t. Coli. Cells/100 ml			(+)	Chrom-Total ppm ~~mg/l~~	0.002	/ 0.001	0.001
[illegible]cal Coli. Cells/100 ml				Chrom-Hex. mg/l			
				Chrom-Tri. mg/l			
[illegible]	7.1	7.1	7.4	Copper mg/l			
[illegible]ec. Cond. umhos/cm	1100	820	700	Iron mg/l			
[illegible]kalinity mg/l as $CaCO_3$	470	462	538 (+)	Lead mg/l	0.003	0.007	0.006
[illegible]idity mg/l as $CaCO_3$				Lithium mg/l			
[illegible]t. Hard. mg/l as $CaCO_3$				Magnesium mg/l			
[illegible]sid. Cl_2 mg/l				Manganese mg/l			
[illegible]mide mg/l				Mercury ug/l			
[illegible]oride mg/l				Nickel mg/l			
[illegible]uoride mg/l				Potassium mg/l			
[illegible]ani[illegible]otal mg/l				Silver mg/l			
[illegible]anide [illegible]ree mg/l				Sodium mg/l			
				Strontium mg/l			
				Tin mg/l			
				Zinc mg/l			

Our methods are in accordance with the American Public Health Association, Standard Methods 15th Edition.

[illegible]LYSIS CERTIFIED BY: _____, Director

Retyped
Date 7/19/84 ak

SUBURBAN LABORATORIES, Inc.

CHEMICAL ANALYSTS SINCE 1936

40 LITT DRIVE • Phone 312/544-3260 • HILLSIDE, ILLINOIS 60162

Certifications: U.S.D.A. #1783 • Ill. Dept. of Public Health #17135 • Amer. Spice Trade Assn. • F.D.A. Reg. #50296 • Ill. EPA #100191

ANALYSIS REPORT

NO. #5435, #5436, #5437

John Yates & Associates
Attn: Mr. John Yates
320 South Sunset Avenue
La Grange, Illinois 60525

P.O. No. _____

Sample Recd. 5/22/84 Tests Completed 6/1/84

SAMPLE INFORMATION

Source Re: Terracon Consultants, P.O. Box #2025, Davenport, Ia, 52809, Job #783563-1

#5435 - #MW-4, Proj. Polo, 5/18/84
#5436 - #MW-4d Proj. Polo, 5/18/84
#5437 - #MW-5, Proj. Polo, 5/18/84 (+) by HGA

Sampling Method: By Client X By Sub. Lab. _____ Serco Auto-Sampler _____ Other _____

ANALYSIS

	#5435	#5436	#5437		#5435	#5436	#5437
Total Solids mg/l				Nitrogen-Tot mg/l			
Vol. Tot. Sol. mg/l				Nitrogen-Amm mg/l			
Fix. Tot. Sol. mg/l				Nitrogen-Org mg/l			
Tot. Susp. Solids mg/l	760	752	552	Nitrite mg/l			
Settle. Sol. ml/l				Nitrate mg/l			
Vol. Sus. Sol. mg/l				Phosphate (Total) mg/l			
Fix. Sus. Sol. mg/l				Phosphate (Ortho) mg/l			
Fix. Sus. Sol. mg/l				Sulfate mg/l			
				Sulfide mg/l			
BOD mg/l				Sulfite mg/l			
COD mg/l	743	46	368	Aluminum mg/l			
TOC mg/l				Antimony mg/l			
				Arsenic mg/l			
Phenols ug/l				Barium mg/l			
MBAS mg/l				Beryllium mg/l			
Oils & Greases mg/l				Boron mg/l			
				Cadmium mg/l			
Tot. Bact. Cells/100 ml				Calcium mg/l			
Tot. Coli. Cells/100 ml			(+)	Chrom-Total ppm ~~mg/l~~	0.002	0.003	/ 0.001
Fecal Coli. Cells/100 ml				Chrom-Hex. mg/l			
				Chrom-Tri. mg/l			
pH	6.9	6.9	6.9	Copper mg/l			
Spec. Cond. umhos/cm	1050	1080	800	Iron mg/l			
Alkalinity mg/l as $CaCO_3$	622	568	358 (+)	Lead ppm ~~mg/l~~	0.006	0.006	0.003
Acidity mg/l as $CaCO_3$				Lithium mg/l			
Tot. Hard. mg/l as $CaCO_3$				Magnesium mg/l			
Chlorid. Cl_2 mg/l				Manganese mg/l			
Bromide mg/l				Mercury ug/l			
Chloride mg/l				Nickel mg/l			
Fluoride mg/l				Potassium mg/l			
Cyanic Total mg/l				Silver mg/l			
Cyanide-Free mg/l				Sodium mg/l			
				Strontium mg/l			
				Tin mg/l			
				Zinc mg/l			

Our methods are in accordance with the American Public Health Association, Standard Methods 15th Edition

ANALYSIS CERTIFIED BY: _____, Director

Retyped
Date 7/19/84 ak

SUBURBAN LABORATORIES, Inc.

CHEMICAL ANALYSTS SINCE 1936

9 LITT DRIVE • Phone 312/544-3260 • HILLSIDE, ILLINOIS 60162

Certifications: U.S.D.A. #1783 • Ill. Dept. of Public Health #17135 • Amer. Spice Trade Assn. • F.D.A. Reg. #50296 • Ill. EPA #100191

ANALYSIS REPORT

NO. #5438

John Yates & Associates
Attn: Mr. John Yates
320 South Sunset Avenue
La Grange, Illinois 60525

P.O. No. _____

ple Recd. 5/22/84 Tests Completed 6/1/84

SAMPLE INFORMATION

rce Re: Terracon Consultants, P.O. Box #2025, Davenport, Ia., Job #783563-1

#5438 - #MW-6, Proj. Polo, 5/18/84

(+) by HGA

pling Method: By Client X By Sub. Lab. _____ Serco Auto-Sampler _____ Other _____

ANALYSIS

		#5438					#5438		
al Solids	mg/l				Nitrogen-Tot	mg/l			
. Tot. Sol.	mg/l				Nitrogen-Amm	mg/l			
. Tot. Sol.	mg/l				Nitrogen-Org	mg/l			
s. Solids	mg/l	1024			Nitrite	mg/l			
rle. Sol.	ml/l				Nitrate	mg/l			
t. Sus. Sol.	mg/l				Phosphate (Total)	mg/l			
. Sus. Sol.	mg/l				Phosphate (Ortho)	mg/l			
l. Sus. Sol.	mg/l				Sulfate	mg/l			
					Sulfide	mg/l			
D	mg/l				Sulfite	mg/l			
D	mg/l	1267			Aluminum	mg/l			
	mg/l				Antimony	mg/l			
					Arsenic	mg/l			
enols	ug/l				Barium	mg/l			
AS	mg/l				Beryllium	mg/l			
ls & Greases	mg/l				Boron	mg/l			
					Cadmium	mg/l			
. Bact.	Cells/100 ml				Calcium	mg/l			
. Coli.	Cells/100 ml			(+)	Chrom-Total	ppm xxxx	0.002		
cal Coli.	Cells/100 ml				Chrom-Hex.	mg/l			
					Chrom-Tri.	mg/l			
		7.1			Copper	mg/l			
ec. Cond.	umhos/cm	1400			Iron	mg/l			
kalinity	mg/l as $CaCO_3$	928		(+)	Lead	ppm xxxx	0.003		
idity	mg/l as $CaCO_3$				Lithium	mg/l			
t. Hard.	mg/l as $CaCO_3$				Magnesium	mg/l			
sid. Cl_2	mg/l				Manganese	mg/l			
mide	mg/l				Mercury	ug/l			
oride	mg/l				Nickel	mg/l			
uoride	mg/l				Potassium	mg/l			
anid tal	mg/l				Silver	mg/l			
anide-Free	mg/l				Sodium	mg/l			
					Strontium	mg/l			
					Tin	mg/l			
					Zinc	mg/l			

Our methods are in accordance with the American Public Health Association, Standard Methods 15th Edition

ALYSIS CERTIFIED BY _____, Director

Retyped

Date 7/19/84 (ak)

A.4 Closure/ Post-Closure

Art K.

Illinois Environmental Protection Agency 2200 Churchill Road, Springfield, IL 62706

217/782-6762

Refer to: 1410450001 -- Ogle
Central Quality Industries
Closure Plan Approved: February 11, 1986 Log #C-177
ILD005176441
RCRA-Closure

January 28, 1988

Central Quality Industries Inc.
Attn: Mr. Robert Hewes
900 South Division Avenue
P.O. Box 247
Polo, Illinois 61064

Dear Mr. Hewes:

The subject hazardous waste management facility was inspected by a representative of this Agency on March 16, 1987. The inspection revealed that the closure activity was completed in accordance with the approved closure plan dated February 11, 1986.

Certification that the container storage area (S01) had been closed in accordance with the approved closure plan by yourself, and an independent registered professional engineer, John J. Yates, P.E., of Illinois was received at this Agency January 21, 1987 and January 13, 1987.

The Agency has determined that the closure of the container storage area has apparently met the requirements of Interim Status Standards, 35 Ill. Admin. Code, Part 725 (40 CFR, Part 265). Please note, the Agency has withdrawn your Part A application dated November 18, 1980 to reflect the status change due to completed closure activities.

This facility must continue to meet the requirements of 35 IAC Section 722 Standards Applicable to Generators of Hazardous Waste.

If you have any questions, please contact Karen Nachtwey at 217/782-0892.

Very truly yours,

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:KEN:rmi/0085j/6

cc: Rockford Region
USEPA Region V, Mary Murphy
USEPA Region V, Art Kawatachi
John J. Yates, P.E.
Division File
Financial Assurance Unit
Compliance Monitoring

D. Corrective Action

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

April 21, 1993

Mr. Dean Hamilton
Central Quality Industries, Inc.
900 South Division Street
Polo, Illinois 61064

Re: Visual Site Inspection
Central Quality Industries, Inc.
Polo, Illinois
ILD 005 176 441

Dear Mr. Hamilton:

The U.S. Environmental Protection Agency is enclosing a copy of the final Preliminary Assessment/Visual Site Inspection (PA/VSI) report for the referenced facility. The executive summary and conclusions and recommendations sections have been withheld as Enforcement Confidential.

If you have any questions, please call Francene Harris at (312) 886-2884.

Sincerely yours,

Kevin M. Pierard, Chief
Minnesota/Ohio Technical Enforcement Section
RCRA Enforcement Branch

U.S. Environmental Protection Agency
Office of Waste Programs Enforcement
Contract No. 68-W9-0006

TES 9

Technical Enforcement Support at Hazardous Waste Sites Zone III Regions 5,6, and 7

PRC
PRC Environmental Management, Inc.

PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118

PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

CENTRAL QUALITY INDUSTRIES, INC.
POLO, ILLINOIS
ILD 005 176 441

FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

Work Assignment No.	:	C05087
EPA Region	:	5
Site No.	:	ILD 005 176 441
Date Prepared	:	March 4, 1993
Contract No.	:	68-W9-0006
PRC No.	:	009-C05087IL4P
Prepared by	:	Resource Applications, Inc. (Michael W. Gorman)
Contractor Project Manager	:	Shin Ahn
Telephone No.	:	(312) 856-8700
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

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EXECUTIVE SUMMARY

Resource Applications, Inc. (RAI), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Central Quality Industries, Inc., (CQI) facility in Polo, Illinois. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritizing RCRA facilities for corrective action.

The CQI facility manufactured steel fabricated equipment for lawn maintenance and household uses. Operations included the shearing, stamping, welding, and painting of steel. Solvent-based and water-based paints were applied by spray guns in two separate paint booths. Before painting, parts were cleaned in a cleaning system that consisted of a tank containing an iron phosphate solution and two water rinse tanks. A conveyor system transported parts through the two paint booths and periodically, the hooks holding the parts were cleaned in an alkaline stripping solution. The aforementioned operations generated spent xylene (F003, D001), water-based paint waste (D008), waste alkaline stripper (D002, D007), obsolete paint (D001), waste paint filters (nonhazardous), waste iron phosphate (nonhazardous), and used oil (nonhazardous).

The CQI facility began operations in 1950. Prior to construction of the facility, the area was agricultural land. In late 1989, CQI declared bankruptcy and vacated the premises. Actual ownership is in dispute. Joe Eichholz, who inherited the facility from his father Arthur, has first claim to the title; however, the City of Polo has a financial interest in the property because of industrial revenue bonds (IRBs) issued to CQI. Because of bankruptcy, CQI was unable to pay off the IRBs. Once the issue of whether or not on-site soil contamination requires remediation is resolved, Joe Eichholz will sell the property and use profits to pay off the IRBs. Currently, the buildings are abandoned. During operations, CQI employed 135 people during the winter and 40 in the summer.

CQI submitted a RCRA Part A permit application to EPA on November 18, 1980, listing a 2,000-gallon capacity container storage area (S01) and a 600-cubic-yard waste pile (S03). The S01 process code referred to the Former Drum Storage Area (SWMU 2). EPA later confirmed that the waste pile never existed and that the S03 process code was mistakenly put on the application. On November 14, 1985, CQI submitted a closure plan to the Illinois Environmental Protection Agency (IEPA) for SWMU 2. According to a January 28, 1988 letter from IEPA, the closure of SWMU 2 met the requirements outlined in the closure plan and stated that CQI would be regulated as a small-quantity generator only.

From 1950 to 1980, spent xylene (F003, D001), waste alkaline stripper (D002, D007), and nonhazardous waste iron phosphate were routinely discharged at the Former Outdoor Disposal Area (SWMU 3). This disposal practice ceased in 1980 and wastes were either placed in 55-gallon drums and managed in SWMU 2 or shipped off site in bulk, directly from process.

The PA/VSI identified the following four SWMUs at the CQI facility:

Solid Waste Management Units

1. Former Satellite Accumulation Areas
2. Former Drum Storage Area
3. Former Outdoor Disposal Area
4. Former Indoor Storage Area

No Areas of Concern were identified during the PA/VSI.

The practice of disposing of wastes at SWMU 3 resulted in a release to on-site soils and surface water. Potential for release to ground water and air was high, because ground water is located approximately 5 feet below the surface and xylene readily volatizes. In 1983 and 1984, Yates and Auberle, Inc., a contractor for CQI, conducted ground water, surface water, and soil analyses. Chromium and lead concentrations at less than 0.1 part per million (ppm) were detected in the soil; chromium at 0.001 ppm and lead at 0.003 ppm were detected in surface water; and the highest ground water contamination was at 0.003 ppm for chromium and 0.007 ppm for lead. In 1986, IEPA established cleanup objectives for soil, surface water, and ground water at 0.1 ppm for lead and 0.05 ppm for chromium. The only constituent that may have been above IEPA cleanup objectives was chromium, detected at a concentration in the soil of less than 0.1 ppm. In 1986 and 1987, ground

water and surface water samples were taken and results indicated that lead and chromium contamination in both media were below IEPA cleanup objectives. In June 1992, Star Environmental Consultants (Star) conducted ground water analyses for lead, chromium, and volatile organic compounds (VOC). Again, lead and chromium concentrations were below IEPA cleanup objectives. Xylene concentrations, the VOC contaminant of concern, was below 1.0 part per billion (ppb). Cleanup levels for VOCs have not been established by IEPA. Potential for release to environmental media from SWMUs 1, 2, and 4 is low, because wastes were managed indoors, inside 55-gallon steel drums on a 6-inch thick concrete floor.

The CQI facility is located at 900 South Division Street in Polo, Ogle County, Illinois. The 20,000-square-foot facility is situated on a 7.5-acre parcel of land that is bounded on the north by a small commercial appliance shop, on the south by an agricultural equipment dealership, on the east by agricultural land, and on the west by residences. The nearest residence is about 100 feet west of the facility, and the nearest school, Polo High School, is located 1.5 miles east of the facility. Site security at the time of operation is unknown. During the VSI, the doors to the facility were locked and a 7-foot-high chain-link fence surrounded three sides of the Former Drum Storage Area (SWMU 2) (a building wall secures the fourth side). Access to the Former Outdoor Disposal Area (SWMU 3) is uncontrolled.

The City of Polo receives water from three deep ground water wells. Ground water can be reached at a depth of 5 feet below ground surface; however, municipal and private wells are drilled at depths greater than 1,000 feet. The closest municipal well is at a depth of 1,234 feet and is located approximately 1 mile northeast of the facility. There are 65 residential ground water wells within 2 miles of the facility. The exact locations of all private wells are not known.

There is a 2-acre palustrine, emergent seasonally flooded wetland approximately 1 mile northeast of the facility and several riverine wetland areas (1 to 2 acres in size) approximately 1 mile northwest of the facility. Ogle County provides wintering habitat for the bald eagle (Haliaeetus leucocephalus) and the prairie bush-clover (Lespedeza leptostachya) can be found in dry to mesic prairies within the county. Both the bald eagle and the prairie bush-clover are endangered species.

RAI recommends that the facility continue evaluating on-site soil and off-site contamination at SWMU 3, per IEPA directive and if necessary, conduct remediation. RAI recommends no further action for SWMUs 1, 2, and 4.

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5. Resource Applications, Inc. (RAI), TES 9 team member, provided the necessary assistance to complete the PA/VSI activities for the Central Quality Industries, Inc., (CQI) facility.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has usually exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading or unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where a strong possibility exists that such a release might occur in the future.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations, if needed; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the CQI facility (EPA Identification No. ILD 005 176 441) in Polo, Ogle County, Illinois. The PA was completed on September 1, 1992. RAI gathered and reviewed information from the Illinois Environmental Protection Agency (IEPA) and from EPA Region 5 RCRA files. RAI also reviewed or obtained additional information from the U.S. Department of Commerce (USDC), U.S. Department of the Interior (USDI), U.S. Geological Survey (USGS), Federal Emergency Management Agency (FEMA), and the Illinois State Geological Survey. The VSI was conducted on September 2, 1992. It included interviews with facility representatives and a walk-through inspection of the facility. RAI identified four SWMUs and no AOCs at the facility.

RAI completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included as Attachment A. The VSI is summarized and five inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C. Attachment D contains results from ground water, surface water, and soil analyses conducted in 1983 and 1984. Attachment E contains results from ground water and surface water analyses conducted in 1986 and 1987. Attachment F contains results from ground water analyses conducted in 1992.

2.0 FACILITY DESCRIPTION

This section describes the facility's location; past and present operations; waste generating processes and waste management practices; a history of documented releases; regulatory history; environmental setting; and receptors.

2.1 FACILITY LOCATION

The CQI facility is located at 900 South Division Street in Polo, Ogle County, Illinois. Polo is approximately 30 miles southwest of Rockford, Illinois. Figure 1 shows the location of the facility in relation to surrounding topographic features (latitude 41°58'40" N and longitude 89°34'36" W). CQI occupies 20,000 square feet on a 7.5-acre parcel of land in a residential and agricultural area.

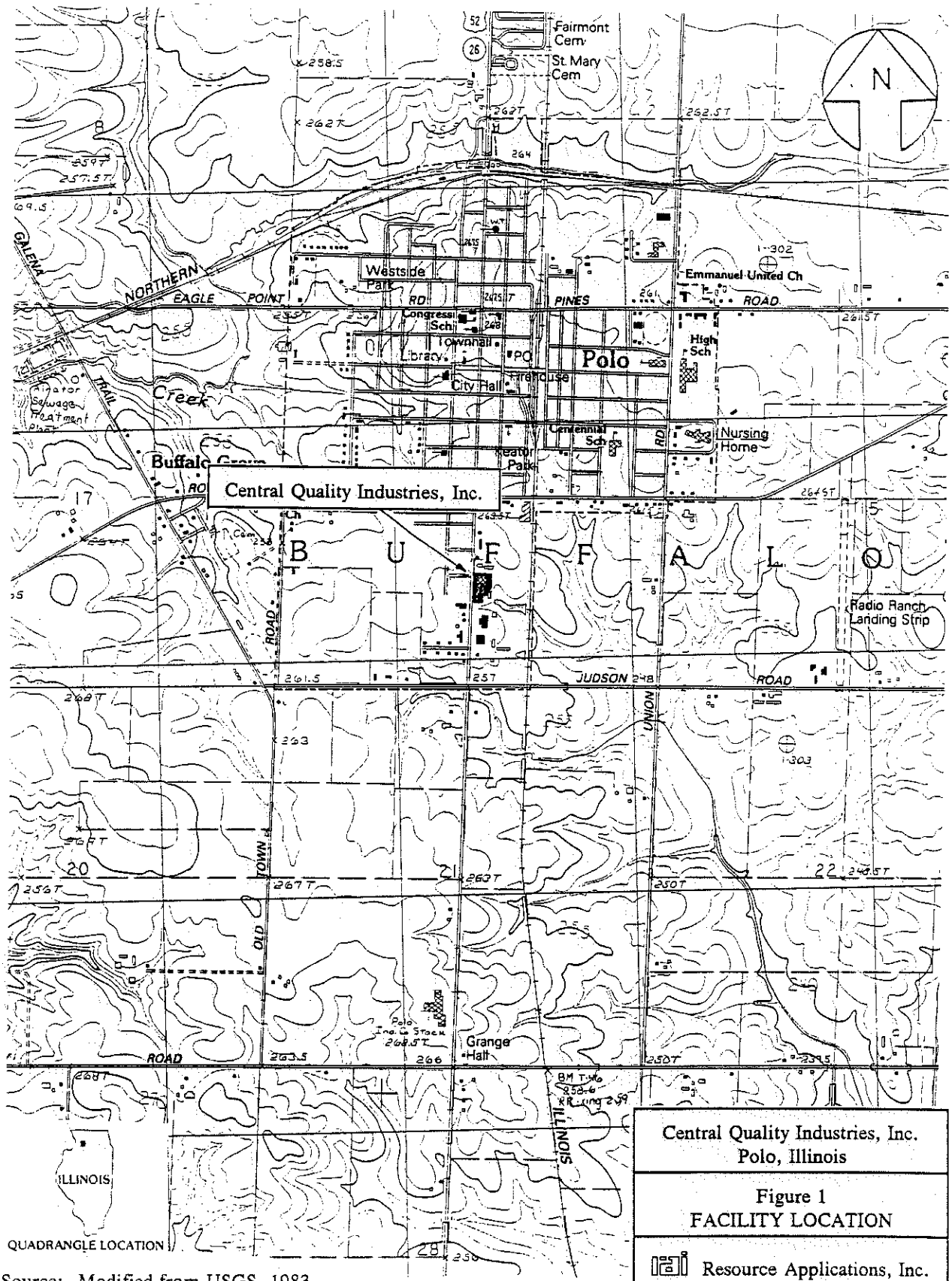
The CQI facility is bordered on the north by a commercial appliance shop, on the west by residences, on the south by an agricultural equipment dealership, and on the east by agricultural land.

2.2 FACILITY OPERATIONS

Because facility representatives could not be located, actual operations are unknown. All information provided in this report is based on IEPA documents, EPA documents, and reports by private consultants hired by CQI.

CQI manufactured tool boxes, lawn spreaders, file cabinets, and other household products by stamping and fabricating steel, which was the primary raw material. Steel fabricating included shearing, punch pressing, welding, painting, and assembly.

CQI operated two spray paint booths, one utilizing solvent-based paints, and the second using water-based paints. A conveyor system was used to transport parts through the paint booths. Paint residue that would build up on conveyor hooks was periodically removed with an alkaline stripping solution. Paint stripping was conducted in a series of three tanks, each measuring approximately 400 gallons. The first tank contained the stripping solution and the other two tanks contained a water rinse solution.



Central Quality Industries, Inc.
Polo, Illinois

Figure 1
FACILITY LOCATION

Resource Applications, Inc.

Source: Modified from USGS, 1983

Scale: 1:24,000

Prior to painting, all parts were cleaned in a three-stage washing system. The system consisted of a 1,750-gallon tank containing an iron phosphate solution, and two 950-gallon water rinse tanks.

CQI began operations in 1950. Prior to 1950, the area was agricultural land. In 1989, CQI declared bankruptcy and abandoned the facility. During operations, CQI employed 135 people during the winter and 40 in the summer. Actual ownership is in dispute. Joe Eichholz, who inherited the facility from his father Arthur, has first claim to the title; however, the City of Polo has a financial interest in the property. The City of Polo issued industrial revenue bonds (IRBs) to CQI for the purpose of financing facility improvements. Because of bankruptcy, CQI was unable to pay off the IRBs. Once the issue of whether or not on-site soil contamination requires remediation is resolved, Joe Eichholz will sell the property and use profits to pay off the IRBs.

Raw commercial product was stored inside 55-gallon drums at the Former Indoor Storage Area (SWMU 4). There were no aboveground storage tanks at the facility. According to Star Environmental Consultants (Star), who are representing Mr. Eichholz, an underground storage tank (UST) containing gasoline is registered with the State of Illinois Fire Marshal as being located on the site. However, no evidence of an UST has been discovered by Star.

Hazardous and nonhazardous wastes were discharged outside from 1950 until 1980 at the Former Outdoor Disposal Area (SWMU 3). The facility began drumming waste in 1980. Waste generation and management are discussed in detail in Section 2.3.

2.3 WASTE GENERATION AND MANAGEMENT

CQI generated spent xylene (F003, D001), water-based paint waste (D008), waste alkaline stripper (D002 and D007), and obsolete paint (D001). CQI also generated the following nonhazardous wastes: waste paint filters, used oil, oil-contaminated floor sweepings, and waste iron phosphate. Rates of waste generation are based on a 1987 IEPA inspection. Facility SWMUs are identified in Table 1; the facility layout, including the location of each SWMU is included in Figure 2. The waste streams from the CQI facility are summarized in Table 2.

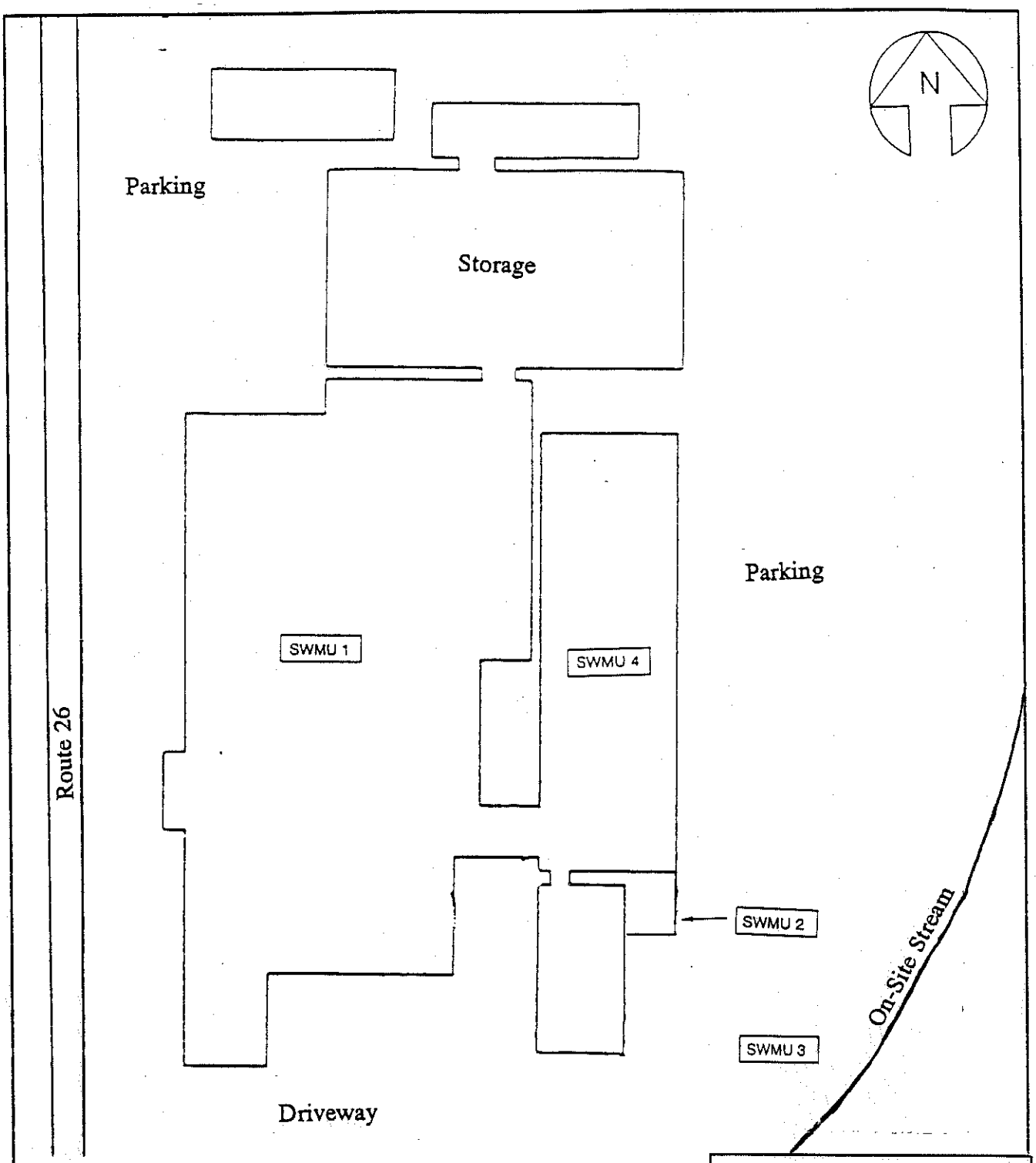
TABLE 1

SOLID WASTE MANAGEMENT UNITS

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit[a]	Status
1	Former Satellite Accumulation Areas	No	Inactive
2	Former Drum Storage Area	Yes	Inactive, RCRA closed in 1987
3	Former Outdoor Disposal Area	No	Inactive
4	Former Indoor Storage Area	No	Inactive

Note:

[a] A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.



Source: Modified from Yates and Auberle, 1984

Solid Waste Management Units (SWMU)

1. Former Satellite Accumulation Areas
2. Former Drum Storage Area
3. Former Outdoor Disposal Area
4. Former Indoor Storage Area

Scale: 1′=75″

Central Quality Industries, Inc.
Polo, Illinois

Figure 2
FACILITY LAYOUT

Resource Applications, Inc.

TABLE 2

SOLID WASTES

Waste/EPA Waste Code[a]	Source	Solid Waste Management Unit
Spent Xylene/F003, D001	Painting Operations	1, 2, and 3
Water-Based Paint Waste/D008	Painting Operations	1 and 2
Waste Alkaline Stripper/D002, D007	Paint Stripping Operations	2 and 3
Obsolete Paint/D001	Painting Operations	2
Waste Paint Filters/NA	Painting Operations	1 and 2
Used Oil/NA	Productive Machinery	1 and 2
Oil-Contaminated Floor Sweepings/NA	Facility Maintenance	2
Waste Iron Phosphate/NA	Cleaning Operation	3, and removed directly from process
Waste Boiler Cleaner/D002	Facility Maintenance	4[b]
Wastewater and Oil Mixture/NA	Facility Maintenance	4[b]

Notes:

[a] Not applicable (NA) designates nonhazardous waste.

[b] Generated during cleanup, after the facility ceased operations.

Xylene was used as a paint thinner and cleaning solution in one of the two paint booths. Spent xylene (F003, D001) was generated when xylene was pumped through the paint lines and spray guns for the purpose of flushing out paint residue. After 1980, the waste was initially managed in a 55-gallon drum at a Former Satellite Accumulation Area (SWMU 1) and when full, the drum was transferred to the Former Drum Storage Area (SWMU 2). Generated at a rate of 400 gallons per year, spent xylene (F003, D001) was picked up by Liquid Waste Disposal (LWD), for fuel blending at Environmental Waste Resources (EWR) in Coal City, Illinois. Prior to 1980, all spent xylene (F003, D001) was dumped in the Former Outdoor Disposal Area (SWMU 3) at a rate of approximately 700 gallons per year.

The second spray booth used water-based paint with a lead content. Water-based paint waste (D008) was generated in the same fashion as spent xylene (F003, D001). Between 1980 and 1985, when the facility ceased water-based painting operations, the waste was managed in SWMU 1 before transfer to SWMU 2. Generated at a rate of 1,700 gallons per year, the waste was picked up by EWR for landfilling at Coal City, Illinois. Prior to 1980, management of this waste stream is unknown.

An alkaline solution (pH 13.8) was used to strip residual paint off conveyor hooks. When the solution became contaminated, the waste alkaline stripper (D002, D007) was pumped into 55-gallon drums. According to available documents, waste alkaline stripper was not initially managed at the point of generation. After 1980, the drums were transferred directly to SWMU 2, where they were picked up for neutralization by Envirite, Inc. (Envirite), in Harvey, Illinois at a rate of 3,650 gallons per year. From 1950 to 1980, the waste was dumped at SWMU 3 at a rate of 1,000 gallons per year.

CQI generated obsolete paint (D001) during routine housekeeping at the facility. The paint was collected in 55-gallon drums and transported to SWMU 2 where it was picked up by EWR for treatment at Coal City, Illinois. It is not known how this waste was managed prior to 1980.

Nonhazardous waste paint filters were generated from the spray painting operations. The waste was initially managed in a 55-gallon drum at SWMU 1. When the drum became full, it was transferred to SWMU 2. Generated at a rate of 35 to 40 drums per year, the waste was picked up by

Peoria Disposal Company (PDC) for landfilling at its Peoria, Illinois landfill. It is not known how the waste was managed prior to 1980.

Oil was utilized at CQI to lubricate production machinery. Nonhazardous used oil was generated from routine machine maintenance and collected in 55-gallon drums at SWMU 1. When the drum was full, it was transferred to SWMU 2. Generated at a rate of 5,000 gallons per year, the waste was picked up by Moreco Energy, Incorporated (Moreco) of McCook, Illinois for recycling. It is not known how this waste stream was managed prior to 1980.

CQI generated nonhazardous oil-contaminated floor sweepings from general facility maintenance. The waste was collected in 55-gallon drums and managed in SWMU 2. Generated at a rate of 35 cubic yards per year, the waste was picked up by ESG Watts for landfilling at Andalusia, Illinois. It is not known how this waste was managed prior to 1980.

CQI used an iron phosphate solution to clean parts prior to painting. The cleaning system consisted of a tank with iron phosphate solution (pH 3.6 to 3.8) and two water rinse tanks. When the iron phosphate solution became contaminated, PDC would pump the nonhazardous waste into a tanker truck and transport it to its Peoria, Illinois wastewater treatment system at a rate of 4,000 gallons per year. Prior to 1980, the waste was drained from the tanks through a piping system and discharged at SWMU 3.

When Star began examining and evaluating the CQI facility for Mr. Eichholz, several drums of waste were discovered at the Former Indoor Storage Area (SWMU 4). One 55-gallon drum of waste boiler cleaner (D002) and 12,670 gallons of nonhazardous wastewater and oil mixture were removed from the facility. The drum of waste boiler cleaner was picked up by Laidlaw Environmental Services and sent to Pecatonica, Illinois for neutralization. The nonhazardous wastewater and oil mixture was picked up in bulk by Moreco for recycling in McCook, Illinois.

2.4 HISTORY OF DOCUMENTED RELEASES

Between 1950 and 1980, the CQI facility systematically discharged hazardous and nonhazardous waste to on-site soils and an unnamed stream, which make up the Former Outdoor

Disposal Area (SWMU 3). The area is located at the southeast corner of the facility. Approximately 700 gallons of spent xylene (F003, D001) and 6,000 gallons of waste alkaline stripper (D002, D007) were discharged annually at SWMU 3. Between 1972 and 1980, approximately 6,000 gallons per year of nonhazardous waste iron phosphate were also discharged at SWMU 3. All of the above information was acquired during a May 1981 RCRA inspection conducted by IEPA (IEPA, 1981). In December 1983 and continuing into 1984, the facility conducted ground water, surface water, and soil analyses to determine the extent of contamination at SWMU 3 (see Attachment D). The 1983 and 1984 study concluded that despite the amount of waste discharged at SWMU 3, no significant impact to on-site soils, surface water, or ground water was detected (IEPA, 1985a). Extraction Procedure Toxicity (E.P. Tox) testing of soil detected chromium and lead concentrations at less than 0.1 part per million (ppm); surface water analysis yielded results of chromium at 0.001 ppm and lead at 0.003 ppm; and the highest ground water contamination was at 0.003 ppm for chromium and 0.007 ppm for lead (Yates and Auberle, 1984). Because only slight contamination was detected, additional analysis was recommended by IEPA (IEPA, 1985a). In 1986, IEPA established cleanup objectives for soil (extract), surface water, and ground water at 0.1 ppm for lead and 0.05 ppm for chromium (IEPA, 1986a). As evidenced above, chromium concentrations in soil may have been slightly above IEPA cleanup objectives. In 1986 and 1987, ground water and surface water samples were taken (see Attachment E). Results from ground water and surface water analyses for lead and chromium were below IEPA cleanup objectives (Yates and Auberle, 1987). In June 1992, Star conducted ground water analyses for lead, chromium, and volatile organic compounds (VOC). Results for lead and chromium were below IEPA cleanup objectives (Star, 1992). Results for VOC analyses are included in Attachment F. Cleanup levels for VOCs have not been established by IEPA.

There have been no other documented releases at the CQI facility.

2.5 REGULATORY HISTORY

CQI submitted a Notification of Hazardous Waste Activity form to EPA on August 14, 1980, designating the company as a generator and treatment, storage, or disposal (TSD) facility (CQI, 1980a). On November 18, 1980, CQI submitted a RCRA Part A permit application listing a 2,000-gallon capacity container storage area (S01) and a 600-cubic-yard waste pile (S03) (CQI, 1980b). The Part A permit application listed F017 (eventually delisted by EPA), U159, U220, and D002

waste codes. The S01 process code pertained to SWMU 2, the Former Drum Storage Area. According to a telephone conversation record between CQI and EPA, EPA concluded that the waste pile never existed and should not have been put on the Part A permit application (EPA, 1985a). A follow up telephone conversation between EPA and IEPA confirmed that the waste pile did not exist (EPA, 1985b). CQI submitted a closure plan for the Former Drum Storage Area (SWMU 2) on November 14, 1985 and IEPA approved the plan on February 11, 1986 (IEPA, 1986b). A January 28, 1988 letter from IEPA to CQI, stated that the closure met the requirements set forth in the closure plan and that CQI's Part A permit application would be withdrawn and the facility would be regulated as a generator only (IEPA, 1988).

CQI has had RCRA compliance problems, which have been noted during 1981, 1985, and 1987 inspections conducted by IEPA (IEPA, 1981, 1985b, 1987). In 1981, IEPA inspectors discovered that CQI was illegally discharging nonhazardous waste iron phosphate at the Former Outdoor Disposal Area (SWMU 3). Numerous paperwork violations concerning the facility's contingency plan and inspection records were also detected during the 1981 inspection. As a result of the inspection, CQI obtained a permit (discussed later in this section) to discharge the waste iron phosphate and rinse waters to the City of Polo sewer system. Paperwork violations were again observed during a 1985 inspection. A Compliance Inquiry Letter (CIL) was issued on September 10, 1985 (IEPA, 1985c). The violations were considered resolved by IEPA on March 3, 1986 (IEPA, 1986c). On March 9, 1988, a Notice of Violation (NOV) was sent to CQI by EPA concerning a 1987 inspection conducted by IEPA (EPA, 1988a). The inspection discovered that CQI failed to notify EPA for each shipment of F003 waste. The violation was considered resolved by EPA on April 15, 1988 (EPA, 1988b).

As mentioned earlier, CQI obtained a permit from the City of Polo in 1981 to discharge waste iron phosphate to the City of Polo sewer system, at an average flow of 1,500 gallons per day. There were no reported violations of this permit.

No documentation was available stating whether the facility had an air permit or a National Pollutant Discharge Elimination System (NPDES) permit.

There has been no CERCLA activity at the CQI facility.

2.6 ENVIRONMENTAL SETTING

This section describes the climate; flood plain and surface water; geology and soils; and ground water in the vicinity of the facility.

2.6.1 Climate

The CQI facility is located in Polo, Ogle County, Illinois. The nearest U.S. National Weather Service office is located in Dixon, Illinois, approximately 12 miles to the south. There are no significant topographical barriers to the airmass flow. The climate in the area is typically continental, with cold winters; warm summers; and frequent short periodic fluctuations in temperature, humidity, cloudiness, and wind direction (Ruffner and Bair, 1985). The average daily temperature is 50.3 degrees Fahrenheit (°F). The lowest average daily temperature is 24°F in January. The highest average daily temperature is 74.9°F in July (Ruffner, 1985).

The total annual precipitation for the county is 33.65 inches (Ruffner, 1985). Mean annual lake evaporation for the Polo area is 31 inches (USDC, 1968). In winter, about one half of the precipitation, or 10 percent of the annual total, falls as snow. During the fall, winter, and spring, the pattern of precipitation tends to be more uniform over both time and distance, whereas in summer, rainfall is often locally heavy and variable. The 1-year, 24-hour maximum rainfall in the area over the last 25 years is 5.56 inches (Ruffner, 1985).

The prevailing wind is from the west-northwest and the average annual wind speed is 9.8 miles per hour (mph). Average monthly wind speed is highest in April at 11.7 mph from the west-northwest (Ruffner, 1985).

2.6.2 Flood Plain and Surface Water

The facility is located in a Zone C flood plain, that is an area of minimal flooding, outside the 500-year and 100-year flood plains (FEMA, 1984). The nearest surface water body is an unnamed stream that flows along the southern and eastern boundaries of the facility. A portion of the Former Outdoor Disposal Area (SWMU 3) is located in this stream. Storm water runoff at the facility

discharges into the stream, which discharges into Seven Mile Branch approximately 0.5 mile southeast of the facility. Seven Mile Branch is used for recreational purposes and eventually discharges into the Rock River approximately 8 miles southeast of the facility. Buffalo Creek is located 1 mile northwest of the facility and is used for recreational purposes. There are no lakes or reservoirs within 2 miles of the facility (USGS, 1983).

2.6.3 Geology and Soils

The CQI facility is underlain by soils of the Downs and Elco series. The Downs series makes up approximately 80 percent of the mapped unit, with the Elco series comprising the remainder. The upper layer of the Downs series consists of a black to very dark gray, silt loam approximately 7 inches thick. The subsoil is 42 inches of brown and dark yellowish brown, friable silty clay loam. Permeability is moderate and available water capacity is high. Elco soils have a surface layer of dark grayish brown silt loam approximately 6 inches thick. The subsoil consists of 22-inch-thick yellowish brown friable silty clay loam. Permeability is moderate and available water capacity is high (Yates and Auberle, 1984).

Information regarding the depth to, and thickness of, the stratigraphic formations beneath the facility was obtained from a well log of the City of Polo municipal well no. 3 (Polo, 1992). This well is located about 1.5 miles north of the facility and is at a depth of 1,260 feet. Information about bedrock stratigraphy below 1,260 feet was obtained from regional information.

In the City of Polo, Quaternary clays, sand, and gravel lens deposits occur from 4 to 78 feet below ground surface and are 74 feet thick. Quaternary deposits are underlain by intermittent clay, shale, fractured limestone, and limestone deposits of Ordovician Maquoketa Formation. The upper surface of the Maquoketa Formation is located 78 feet below ground surface and is 228 feet thick. The Galena-Platteville Formation, which is composed of dolomite, limestone, and thin beds of sandy shale, underlies the Maquoketa Formation. The Galena-Platteville Formation is 306 feet below ground surface and about 300 feet thick. The Glenwood-St. Peter Sandstone Formation is located 606 feet below ground surface and is only 20 feet thick beneath the City of Polo. This formation consists predominately of clean white sandstone, with some dolomite and shale beds in the upper portion. The Glenwood-St. Peter Sandstone is underlain by the Prairie du Chien Formation, which is 626 feet

below ground surface and about 350 feet thick. The Prairie du Chien Formation consists of interbedded dolomites, pink dolomites, sandstones, and cherty sandstones. Cambrian formations underlie the Prairie du Chien Formation; the uppermost is the Trempealeau Formation, which is located 976 feet below ground surface and is about 110 feet thick. This formation is underlain by the Franconia Formation which is located 1,086 feet below ground surface and is about 120 feet thick. Both the Trempealeau and Franconia Formations consist of interbedded dolomite and micaceous sandstones. These two formations are underlain by the Ironton-Galesville Formation. This formation is the primary water-bearing rock formation for the City of Polo. The Ironton-Galesville Formation is located about 1,200 feet below ground surface and is about 200 feet thick (Polo, 1992). This aquifer is underlain by the Eau Claire Formation which acts as a confining layer for the Ironton-Galesville Formation. The Eau Claire Formation is located about 1,400 feet below ground surface, is about 300 feet thick, and is underlain by the Mt. Simon sandstone. The uppermost layers of this unit are used regionally as an aquifer, however, the City of Polo does not utilize the aquifer. The Mt. Simon Formation is about 1,000 to 2,000 feet thick and is underlain by Precambrian crystalline rock (Sasman and Baker, 1966).

2.6.4 Ground Water

Ground water information is based both on site specific information and regional information. Ground water resources beneath the facility and the City of Polo consist of four geohydrologic units: glacial drift aquifers, shallow dolomite aquifers, Cambrian-Ordovician aquifers, and the Mt. Simon aquifer (Yates and Auberle, 1984). Glacial drift aquifers occur in Quaternary sand and gravel lens deposits which vary locally in depth (Sasman and Baker, 1966). The well log for the City of Polo municipal well No. 3 indicates the presence of a water-bearing gravel lens between 43 and 47 feet below ground surface. Residents of the City of Polo obtain their drinking water from city municipal wells. A number of individual residences access water from glacial drift aquifers via their own private wells. The exact location of these residences and well depths was not determined. Shallow dolomite aquifers consist of the Maquoketa and Galena-Platteville Formations that range from 78 feet to 606 feet below ground surface. Water from the shallow dolomite aquifers may be hydraulically connected to the glacial drift aquifers (Hackett and Bergstrom, 1956).

The Cambrian-Ordovician aquifer is composed of several water-bearing formations. The Glenwood-St. Peter Sandstone is only 20 feet thick beneath the City of Polo. This formation accounts for about 15 percent of the total yield of the Cambrian-Ordovician aquifer. The Prairie du Chien and Trempealeau Formations, which collectively are about 460 feet thick, account for about 35 percent of the total yield of the Cambrian-Ordovician aquifer (Sasman and Baker, 1966). The City of Polo accesses ground water from the Ironton-Galesville Formation located about 1,200 feet below ground surface. The City of Polo is currently using three municipal wells which are 1,200 feet deep, 1,234 feet deep, and 1,260 feet deep. The Ironton-Galesville Formation is hydraulically connected to overlying water bearing formations of the Cambrian-Ordovician aquifer. The Ironton-Galesville Formation accounts for 50 percent of the total yield of the Cambrian-Ordovician aquifer. Well yields average about 500 gallons per minute in the City of Polo (Polo, 1992). The Eau Claire Formation, which underlies the Ironton-Galesville Formation, acts as a confining layer that separates the Cambrian-Ordovician aquifer from the final water-bearing aquifer, the Mt. Simon (Sasman and Baker, 1966).

2.7 RECEPTORS

The 20,000-square-foot CQI facility occupies a 7.5-acre parcel of land in a residential and agricultural area in Polo, Illinois. Polo has a population of about 2,600.

The CQI facility is bordered on the north by a small commercial appliance shop, on the west by residences, on the south by an agricultural equipment dealership, and on the east by agricultural land. The nearest school, Polo High School, is located about 1.5 miles east of the facility. Site security at the time of operations is unknown. During the VSI, the doors to the interior of the facility were locked and a 7-foot-high chain-link fence surrounded three sides of the Former Drum Storage Area (SWMU 2), with a building wall securing the fourth side. Access to the Former Outdoor Disposal Area (SWMU 3) is uncontrolled.

The nearest surface water body, an unnamed intermittent stream, flows along the southern and eastern boundaries of the facility. The stream is used for storm water drainage and discharges into Seven Mile Branch approximately 0.5 mile southeast of the facility. Buffalo Creek is located 1 mile northwest of the facility and is used for recreational purposes.

Ground water supplies the City of Polo with drinking water. Three wells are utilized by the city and the nearest well is located 1 mile northeast of the facility at a depth of 1,234 feet. There are approximately 119 private drinking wells within a 3-mile radius of the facility (EPA, 1984). The exact location or depths of the wells is not known (Polo, 1992).

There is a 2-acre palustrine, emergent seasonally flooded wetland approximately 1 mile northeast of the facility. There are several riverine wetland areas (1 to 2 acres in size) located along Buffalo Creek, approximately 1 mile northwest of the facility (USDI, 1987). Ogle County provides wintering habitat for the bald eagle (Haliaeetus leucocephalus) and the prairie bush-clover (Lespedeza leptostachya) can be found in dry to mesic prairies within the county (USDI, 1989). Both the bald eagle and the prairie bush-clover are endangered species.

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the four SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and RAI's observations. Figure 2 shows the SWMU locations.

SWMU 1 **Former Satellite Accumulation Areas**

Unit Description: The Former Satellite Accumulation Areas were located indoors, and used to accumulate hazardous and nonhazardous wastes at points of generation. Wastes were accumulated inside 55-gallon drums, located on top of 6 inches of concrete. The unit was located near the paint booths and next to each machine that utilized oil. The paint booths measured 30 feet by 30 feet. Because the facility was vacated and no operating equipment was present, the exact location of accumulation points for used oil is unknown (see Photograph No. 1).

Date of Startup: This unit began operation in 1950.

Date of Closure: This unit ceased operations in 1989.

Wastes Managed: This unit managed spent xylene (F003, D001), water-based paint waste (D008), waste paint filters (nonhazardous), and used oil (nonhazardous). Spent xylene (F003, D001) and water-based paint waste (D008) were discharged at SWMU 3, the Former Outdoor Disposal Area, from 1950 to 1980. Prior to 1980, the final disposition of waste paint filters and used oil is unknown. After 1980, all wastes initially managed in SWMU 1 were transported to SWMU 2, the Former Drum Storage Area.

Release Controls: Wastes were managed indoors, inside 55-gallon steel drums.

History of Documented Releases: No releases from this unit have been documented.

Observations: The facility has been vacant since 1989. Only one of the Former Satellite Accumulation Areas was identified and observed.

SWMU 2 **Former Drum Storage Area**

Unit Description: The Former Drum Storage Area is located outdoors, on the southeast corner of the facility. The unit measures 30 feet by 30 feet, has a 6-inch-thick concrete pad, and is surrounded on three sides by a 7-foot-high chain-link fence. The fourth side is secured by a building wall. The unit managed all wastes generated at the facility from 1980 until 1989 (see Photographs No. 2 and 3).

Date of Startup: This unit began operation in 1980.

Date of Closure: The unit underwent RCRA closure as a greater than 90-day storage area in 1987; after which, the unit managed wastes for less than 90 days. The unit ceased managing wastes in 1989, when CQI went bankrupt.

Wastes Managed: This unit managed spent xylene (F003, D001), water-based paint waste (D008), waste alkaline stripper (D002, D007), obsolete paint (D001), used oil (nonhazardous), oil-contaminated floor sweepings (nonhazardous), and waste paint filters (nonhazardous). Spent xylene (F003, D001) was sent to EWR in Coal City, Illinois by LWD for fuel blending; water-based paint waste (D008) and obsolete paint (D001) were picked up by EWR for treatment at Coal City, Illinois; waste alkaline stripper (D002, D007) was discharged at SWMU 3, the Former Outdoor Disposal Area from 1950 to 1980 and after 1980 was picked up by Envirite for neutralization; used oil was picked up by

	Moreco for recycling; oil-contaminated floor sweepings were picked up by ESG and landfilled, and waste paint filters were picked up and landfilled by PDC.
Release Controls:	Wastes were managed inside steel drums located on top of 6 inches of concrete. The unit did not have secondary containment.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	There were no wastes in the unit at the time of the VSI; some cracks were observed on the concrete pad. No floor drains were noted in the area.
SWMU 3	**Former Outdoor Disposal Area**
Unit Description:	The Former Outdoor Disposal Area is located on the southeast side of the facility. The unit consists of a slightly sloped area immediately adjacent to the building, extending to and including the on-site stream. The entire area measures approximately 40 feet wide and 100 feet long. There was no lining at the unit's base or perimeter berms to accurately define the unit (see Photograph No. 4).
Date of Startup:	This unit began operation in 1950.
Date of Closure:	This unit ceased operations in 1980.
Wastes Managed:	This unit managed spent xylene (F003, D001), waste alkaline stripper (D002, D007), and waste iron phosphate (nonhazardous) which were systematically discharged onto the ground and into the stream from 1950 to 1980.

Release Controls:	The unit had no release controls.
History of Documented Releases:	Each time wastes were discharged, a release to on-site soils and surface water occurred. For a detailed discussion, see Section 2.4.
Observations:	Vegetation was growing, and ground water monitoring wells were observed in the unit. No wastes were observed at the unit and no evidence of a release was observed during the VSI.
SWMU 4	**Former Indoor Storage Area**
Unit Description:	The Former Indoor Storage Area is located on the east side of the facility and was used to manage wastes left behind when CQI went bankrupt. The unit measures 20 feet by 40 feet and has a 6-inch-thick concrete floor (see Photograph No. 5).
Date of Startup:	This unit began operation in 1989.
Date of Closure:	All wastes were removed by July 1992.
Wastes Managed:	This unit managed a drum of waste boiler cleaner (D002) and drums of wastewater and oil mixture (nonhazardous). The waste boiler cleaner (D002) was picked up by Laidlaw and transported to Pecatonica, Illinois for neutralization. The wastewater and oil mixture was picked up in bulk by Moreco for recycling.
Release Controls:	The wastes were managed indoors, inside steel drums located on top of 6 inches of concrete.
History of Documented Releases:	No releases from this unit have been documented.

Observations:	There were no drums observed in the unit during the VSI. Small cracks were observed in the floor of the unit. No evidence of a release and no floor drains were noted.

4.0 AREAS OF CONCERN

RAI identified no AOCs during the PA/VSI.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified four SWMUs and no AOCs at the CQI facility. Background information on the facility's location; operations; waste generation and management; history of documented releases; regulatory history; environmental setting; and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. AOCs are discussed in Section 4.0. Following are RAI's conclusions and recommendations for each SWMU. Table 3, at the end of this section, summarizes the SWMUs at the facility and the recommended further actions.

SWMU 1 **Former Satellite Accumulation Areas**

Conclusions: The unit was used to manage spent xylene (F003, D001), water-based paint waste (D008), waste paint filters (nonhazardous), and used oil (nonhazardous). The wastes were managed indoors, inside steel drums, on top of 6 inches of concrete. Therefore, potential for release to ground water, surface water, air, or on-site soils is low.

Recommendations: RAI recommends no further action for this unit.

SWMU 2 **Former Drum Storage Area**

Conclusions: The unit managed wastes initially accumulated in SWMU 1, as well as obsolete paint (D001) and oil-contaminated floor sweepings (nonhazardous). Wastes were managed inside 55-gallon steel drums which were stored on top of 6 inches of concrete. Therefore, past potential for release to ground water, surface water, air, or on-site soils was low. Soil analysis conducted in 1983 and 1984 indicated that no contamination exists at the unit (Yates and Auberle, 1984). The unit has not managed wastes since 1989; therefore, current potential for release to environmental media is low.

Recommendations: RAI recommends no further action for this unit.

SWMU 3 **Former Outdoor Disposal Area**

Conclusions: Spent xylene (F003, D001), waste alkaline stripper (D002, D007), and waste iron phosphate (nonhazardous) were systematically discharged at the unit from 1950 until 1980. Despite the persistent disposal to on-site soils and the unnamed on-site stream, no significant environmental damage has been detected in these media, as evidenced in Attachments D, E, and F. Ground water is located at a depth of 5 feet below ground surface and potential for release to this medium was high. However, according to ground water data, no significant contamination has been detected. While the unit was active, there was a high potential that spent xylene (F003, D001) volatilized and released to the air. Wastes are no longer disposed of in this manner; therefore, current potential for release to environmental media is low.

Recommendations: RAI recommends that the facility continue evaluating on-site soil and off-site contamination at SWMU 3, per IEPA directive, and if necessary, conduct remediation.

SWMU 4 **Former Indoor Storage Area**

Conclusions: When CQI went bankrupt in 1989, several drums of a wastewater and oil mixture (nonhazardous) and one drum of waste boiler cleaner solution (D002) were left on site. The wastes were managed indoors, on top of 6 inches of concrete, and removed in 1992. Therefore, the potential for release to ground water, surface water, air, or on-site soils is low.

Recommendations: RAI recommends no further action for this unit.

TABLE 3

SWMU SUMMARY

SWMU	Dates of Operation	Evidence of Release	Recommended Further Action
1. Former Satellite Accumulation Areas	1950 to 1989	None	RAI recommends no further action.
2. Former Drum Storage Area	1980 to 1989	None	RAI recommends no further action.
3. Former Outdoor Disposal Area	1950 to 1980	Each time wastes were discharged, a release to on-site soils and surface water occurred.	RAI recommends the facility continue with evaluating extent of contamination per IEPA directive. If necessary, remediate.
4. Former Indoor Storage Area	1989 to 1992	None	RAI recommends no further action.

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ATTACHMENT A

EPA PRELIMINARY ASSESSMENT FORM 2070-12

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
IL	ILD 005 176 441

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)	02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER				
Central Quality Industries, Inc.	900 South Division				
03 CITY	**04 STATE**	**05 ZIP CODE**	**06 COUNTY**	**07 COUNTY CODE**	**08 CONG DIST**
Polo	IL	61064	Ogle		

09 COORDINATES: LATITUDE 41° 58' 40" N | LONGITUDE 89° 34' 36" W

10 DIRECTIONS TO SITE *(Starting from nearest public road)*

Interstate 88 west to Highway 26 north to Polo.

III. RESPONSIBLE PARTIES

01 OWNER *(if known)*	02 STREET *(Business, mailing residential)*		
Central Quality Industries, Inc.	900 South Division		
03 CITY	**04 STATE**	**05 ZIP CODE**	**06 TELEPHONE NUMBER**
Polo	IL	61064	( )
07 OPERATOR *(If known and different from owner)*	**08 STREET** *(Business, mailing, residential)*		
09 CITY	**10 STATE**	**11 ZIP CODE**	**12 TELEPHONE NUMBER**

13 TYPE OF OWNERSHIP *(Check one)*

■ A. PRIVATE ☐ B. FEDERAL: _____ *(Agency name)* ☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL

☐ F. OTHER _____ *(Specify)* ☐ G. UNKNOWN

14 OWNER/OPERATOR NOTIFICATION ON FILE *(Check all that apply)*

■ A. RCRA 3010 DATE RECEIVED: 08 / 18 / 80 (MONTH DAY YEAR) ☐ B. UNCONTROLLED WASTE SITE *(CERCLA 103 c)* DATE RECEIVED: ___ / ___ / ___ (MONTH DAY YEAR) ☒ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION

■ YES DATE 09 / 02 / 92

☐ NO

BY *(Check all that apply)*

☐ A. EPA ■ B. EPA CONTRACTOR ☐ C. STATE ☐ D. OTHER CONTRACTOR

☐ E. LOCAL HEALTH OFFICIAL ☐ F. OTHER: _____ *(Specify)*

CONTRACTOR NAME(S): Resource Applications, Inc.

02 SITE STATUS *(Check one)*

☐ A. ACTIVE ■ B. INACTIVE ☐ C. UNKNOWN

03 YEARS OF OPERATION

1950 (BEGINNING YEAR) | 1989 (ENDING YEAR) ☐ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

Xylene, chromium, lead, alkaline stripper, and iron phosphate.

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

Facility discharged spent xylene (F003, D001), water-based paint waste (D008), waste alkaline stripper (D002, D007), waste iron phosphate (nonhazerdous) to on-site soils and surface water from 1950 until 1980. Analysis of ground water, surface water, and on-site soils detected little or no contamination of environmental media. IEPA is currently evaluating the area.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION *(Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.)*

☐ A. HIGH *(Inspection required promptly)* ☐ B. MEDIUM *(Inspection required)* ■ C. LOW *(Inspect on time-available basis)* ☐ D. NONE *(No further action needed; complete current disposition form)*

VI. INFORMATION AVAILABLE FROM

01 CONTACT	02 OF *(Agency/Organization)*			03 TELEPHONE NUMBER
Kevin Pierard	EPA Region V			(312) 886-4448
04 PERSON RESPONSIBLE FOR ASSESSMENT	**05 AGENCY**	**06 ORGANIZATION**	**07 TELEPHONE NUMBER**	**08 DATE**
Michael W. Gorman		Resource Applications, Inc.	(312) 332-2230	09 / 29 / 92

ATTACHMENT B

VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

Central Quality Industries, Inc.
900 South Division Street
Polo, Illinois
ILD 005 176 441

Date:	September 2, 1992
Primary Facility Representative:	Dean Hamilton
Representative Telephone No.:	(815) 288-7330
Additional Facility Representatives:	Gene Berkeley, Senior Project Manager, Star Environmental Consultants (Star) Greg Unger, Project Manager, Star
Inspection Team:	Michael W. Gorman, Resource Applications, Inc. (RAI) Peter McLaughlin, RAI
Photographer:	Peter McLaughlin
Weather Conditions:	Sunny, breezy, temperature about 75°F
Summary of Activities:	The visual site inspection (VSI) began in Dixon, Illinois at 9:30 with an introductory meeting with Mr. Hamilton, Mr. Berkeley, and Mr. Unger. The inspection team explained the purpose of the VSI and the agenda for the visit. Facility representatives then discussed the facility's past operations, solid wastes generated, and release history. Facility representatives provided the inspection team with copies of requested documents. Mr. Berkeley, Mr. Unger, and the inspection team traveled to Polo, Illinois to conduct the VSI tour, which began at 11:30 p.m. During the VSI, RAI observed Former Satellite Accumulation Areas (SWMU 1), the Former Drum Storage Area (SWMU 2), the Former Outdoor Disposal Area (SWMU 3), and the Former Indoor Storage Area (SWMU 4). The tour concluded at 1:00 p.m., after which the inspection team held an exit meeting with facility representatives. The VSI was completed and the inspection team left the facility at 1:30 p.m.

Photograph No. 1 Location: SWMU 1
Orientation: West Date: 9/2/92
Description: According to a facility layout provided by IEPA, this is the location of the paint booths, one of the Former Satellite Accumulation Areas.

Photograph No. 2 Location: SWMU 2
Orientation: Southeast Date: 9/2/92
Description: The Former Drum Storage Area. Staining on right is from water dripping off the facility roof.

Photograph No. 3 Location: SWMU 2
Orientation: East Date: 9/2/92
Description: The Former Drum Storage Area. The bare ground at the top of the photograph is part of the Former Outdoor Disposal Area (SWMU 3). Note monitoring well in the upper right hand corner of photograph.

Photograph No. 4 Location: SWMU 3
Orientation: East Date: 9/2/92
Description: View of the Former Outdoor Disposal Area. The unnamed stream that flows through the facility is located behind the treeline, in the upper portion of the photograph.

Photograph No. 5 Location: SWMU 4
Orientation: South Date: 9/2/92
Description: The Former Indoor Storage Area is where wastes were left when CQI vacated the facility.

ATTACHMENT C
VISUAL SITE INSPECTION FIELD NOTES

9/2/92

Central Quality Industries

Dean Hamilton - Personal Interest

Gene Berkley - STar

Greg Unger - Star

10:00 a.m. Dixon, IL

Partly Cloudy, breezy, about 75° F

Mr. Hamilton is personal friend of Joe Eichholz, owner of CQI. Mr Eichholz is an invalid and thus could not attend

CQI began operations in 1950. Mfg.

metal Fabricated products

lawn spreaders

Grills

File Cabinets

In 1989 CQI went bankrupt

There is a dispute as to who owns site

City issued Industrial Revenue Bonds which were bought by Dixon National Bank

Mr. Eichholz personally backed IRB, when CQI went Bankrupt, Mr. Eichholz paid off bank eliminating them from the loop

From 1950 to 1980 CQI annually discharged to and outdoor disposal area
Previous inspection by IEPA has rates of disposal

Mr Eichholz wishes to sell facility, but cant until issue of whether site is contaminated is resolved

Mr Unger & Mr Hamilton & Mr Berkeley don't have info on facility operations they have provided g.w. samples taken in June 1992.

when Star began working on behalf of Eichholz, seveal drums of waste oil & 1 drum of boiler treatment solution was observed at site, Star had materials shipped off site, will provide details on exact amount later

11:00 left Dixon to head to facility in Polo

Facility is empty, building is locked
North - Appliance Store
South - Dealership
West - Residential
East - Agricultural
School - 1.5 miles East P.H.S.
3 M.W. observed on E & SE sides of facility.
Machinery removed from interior.
Some unidentifiable machinery observed

Photo log

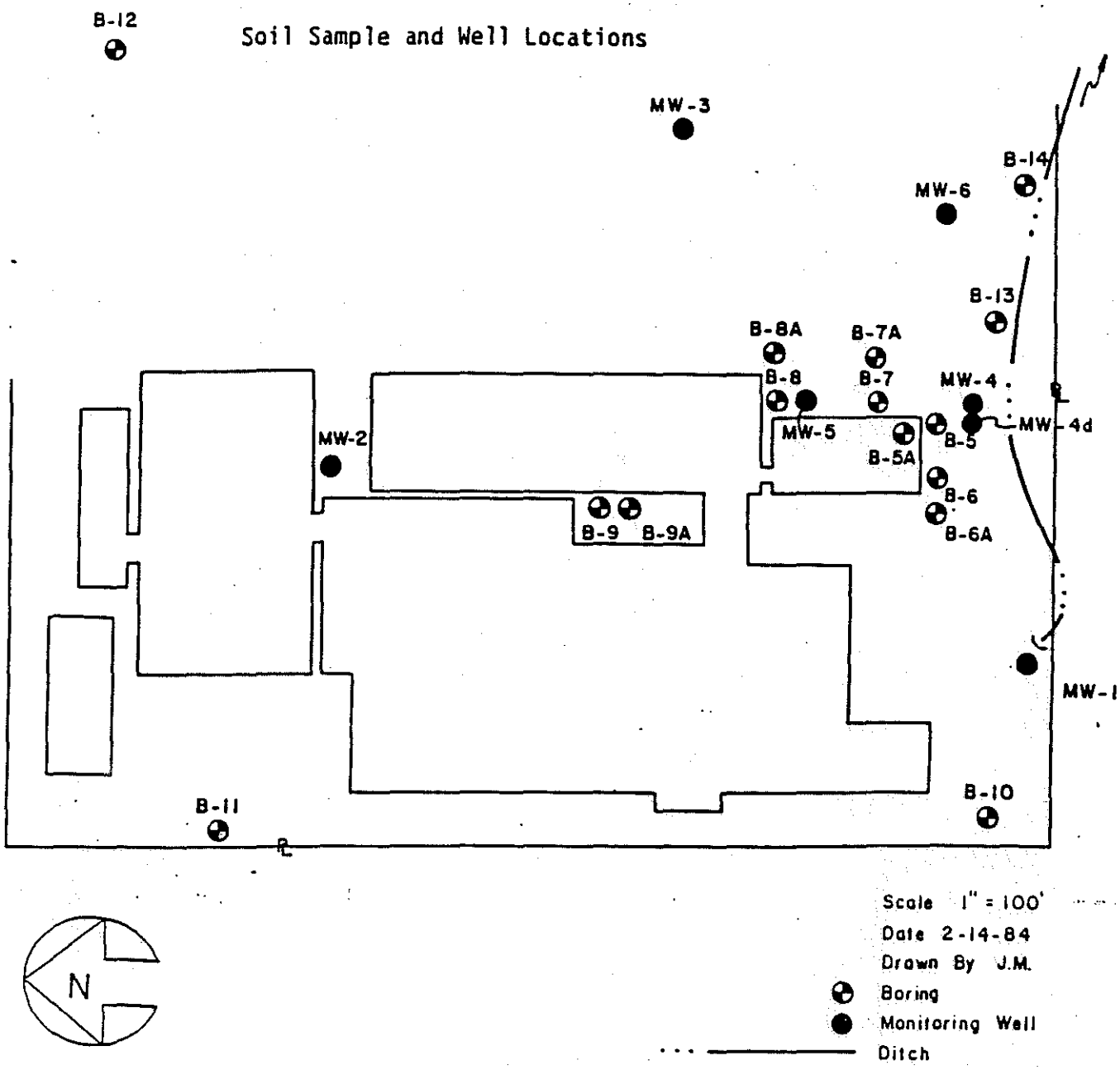
1) S. Area where Star accumulated materials left by CQI
2) S. " "
3) S.E. Drum Storage Area
4) E. " " Monitoring well in background
5) SE Paint Room possible S.A.A.
6) S. Area where Production Equipment was located.
7) W. M.W # 5
8) E Outside Disposal Area

MLO

ATTACHMENT D

1983 and 1984 GROUND WATER, SURFACE WATER, AND SOIL ANALYSES

(Source: Yates and Auberle, 1984)


Soil Sample and Well Locations
B-12
MW-3
B-14
MW-6
B-13
B-8A
B-7A
B-8
B-7
MW-4
MW-4d
MW-5
B-5
B-5A
MW-2
B-6
B-6A
B-9
B-9A
MW-1
B-11
B-10
℄
N
Scale 1" = 100'
Date 2-14-84
Drawn By J.M.
Boring
Monitoring Well
Ditch

SUBURBAN LABORATORIES, Inc.

CHEMICAL ANALYSTS SINCE 1936

4140 LITT DRIVE • Phone 312/544-3260 • HILLSIDE, ILLINOIS 60162

Certifications: U.S.D.A. #3783 • Ill. Dept. of Public Health #17135 • Amer. Spice Trade Assn. • F.D.A. Reg. #50296 • Ill. EPA 0100191

ANALYSIS REPORT

NO. 11661, 11662, 11

REMARKS

John Yates & Associates
Attn: Mr. John Yates
320 South Sunset Avenue
La Grange, Illinois 60525

P.O. No. _____

Sample Recd. 12/27/83 Tests Completed 1/11/84

SAMPLE INFORMATION

Source Re: Mr. Dave Cook, Terracon Consultants, P.O. Box #2025, Davenport, IA 52809 Job #783

S/L #11661 - Upstream 1A & 1B, Composite plus 1C, 11:12 AM, Polo, IL, 12/20/83
S/L #11662 - Downstream 2A & 2B, Composite plus 2C, 10:55 AM, Polo, IL, 12/20/83
S/L #11663 - MW - 1A & 1B, Composite plus 1C, 11:18 AM, Polo, IL, 12/20/83

Sampling Method: By Client X By Sub. Lab. _____ Serco Auto-Sampler _____ Other _____

ANALYSIS

	#11661	#11662	#11663
Total Solids mg/l			
Fix. Tot. Sol. mg/l			
Vol. Tot. Sol. mg/l			
Diss. Solids mg/l	256	700	1028
Settle. Sol. ml/l			
Tot. Sus. Sol. mg/l			
Fix. Sus. Sol. mg/l			
Vol. Sus. Sol. mg/l			
BOD mg/l			
COD mg/l	2249	76	83
DO mg/l			
Phenols ug/l			
MBAS mg/l			
Oils & Greases mg/l			
Tot. Bact. Cells/100 ml			
Tot. Coli. Cells/100 ml			
Fecal Coli. Cells/100 ml			
pH	7.4	7.2	7.3
Spec. Cond. umhos/cm			
Alkalinity mg/l as $CaCO_3$	332	466	393
Acidity mg/l as $CaCO_3$			
Tot. Hard. mg/l as $CaCO_3$			
Resid. Cl_2 mg/l			
Bromide mg/l			
Chloride mg/l			
Fluoride mg/l			
Cyanide-Total mg/l			
Cyanide-Free mg/l			
Xylene mg/l	/ 0.2	/ 0.2	/ 0.2

	#11661	#11662	#11
Nitrogen-Tot mg/l			
Nitrogen-Amm mg/l			
Nitrogen-Org mg/l			
Nitrite mg/l			
Nitrate mg/l			
Phosphate (Total) mg/l			
Phosphate (Ortho) mg/l			
Sulfate mg/l			
Sulfide mg/l			
Sulfite mg/l			
Aluminum mg/l			
Antimony mg/l			
Arsenic mg/l			
Barium mg/l			
Beryllium mg/l			
Boron mg/l			
Cadmium mg/l			
Calcium mg/l			
Chrom-Total mg/l	/ 0.10	/ 0.10	/
Chrom-Hex. mg/l			
Chrom-Tri. mg/l			
Copper mg/l			
Iron mg/l			
Lead mg/l	/ 0.10	0.81	/
Lithium mg/l			
Magnesium mg/l			
Manganese mg/l			
Mercury ug/l			
Nickel mg/l			
Potassium mg/l			
Silver mg/l			
Sodium mg/l			
Strontium mg/l			
Tin mg/l			
Zinc mg/l			

RECEIVED
MAR 28 1984
E.P.A. — D.L.P.C.
STATE OF ILLINOIS

Our methods are in accordance with the American Public Health Association, Standard Methods 15th Edition.

ANALYSIS CERTIFIED BY _____, Director Date 1/12/84 ak

SUBURBAN LABORATORIES, Inc.

CHEMICAL ANALYSTS SINCE 1936

4140 LITT DRIVE • Phone 312/544-3250 • HILLSIDE, ILLINOIS 60162

Certifications: U.S.D.A. #1733 • Ill. Dept. of Public Health #17135 • Amer. Spice Trade Assn. • F.D.A. Reg. #50296 • Ill. EPA 0100131

ANALYSIS REPORT

NO. 11664, 11665, 11666

John Yates & Asaociates
Attn: Mr. John Yates
320 South Sunset Avenue
La Grange, Illinois 60525

P.O. No.

Sample Recd. 12/27/83 Tests Completed 1/11/84

SAMPLE INFORMATION

Source Re: Mr. Dave Cook, Terracon Consultants, P.O. Box #2025, Davenport, IA 52809 Job #78356

W/L #11664 - MW - 2A & 2B, Composite plus MW-2C, 10:17 AM, Polo, IL, 12/20/83
W/L #11665 - MW - 3A & 3B, Composite plus MW-3C, 10:35 AM, Polo, IL, 12/20/83
W/L #11666 - MW - 4A & 4B, Composite plus MW-4C, 11:00 AM, Polo, IL, 12/20/83

Sampling Method: By Client X By Sub. Lab. Serco Auto-Sampler Other

ANALYSIS

	#11664	#11665	#11666
Total Solids mg/l			
Fix. Tot. Sol. mg/l			
Vol. Tot. Sol. mg/l			
Diss. Solids mg/l	656	592	816
Settle. Sol. ml/l			
Tot. Sus. Sol. mg/l			
Fix. Sus. Sol. mg/l			
Vol. Sus. Sol. mg/l			
BOD mg/l			
COD mg/l	54	57	100
OO mg/l			
Phenols ug/l			
MBAS mg/l			
Oils & Greases mg/l			
Tot. Bact. Cells/100 ml			
Tot. Coli. Cells/100 ml			
Fecal Coli. Cells/100 ml			
pH	7.5	7.4	7.1
Spec. Cond. umhos/cm			
Alkalinity mg/l as $CaCO_3$	397	303	554
Acidity mg/l as $CaCO_3$			
Tot. Hard. mg/l as $CaCO_3$			
Resid. Cl_2 mg/l			
Bromide mg/l			
Chloride mg/l			
Fluoride mg/l			
Cyanide-Total mg/l			
Cyanide-Free mg/l			
lene mg/l	/ 0.2	/ 0.2	/ 0.2

	#11664	#11665	#11666
Nitrogen-Tot mg/l			
Nitrogen-Amm mg/l			
Nitrogen-Org mg/l			
Nitrite mg/l			
Nitrate mg/l			
Phosphate (Total) mg/l			
Phosphate (Ortho) mg/l			
Sulfate mg/l			
Sulfide mg/l			
Sulfite mg/l			
Aluminum mg/l			
Antimony mg/l			
Arsenic mg/l			
Barium mg/l			
Beryllium mg/l			
Boron mg/l			
Cadmium mg/l			
Calcium mg/l			
Chrom-Total mg/l	/ 0.10	/ 0.10	/ 0.
Chrom-Hex. mg/l			
Chrom-Tri. mg/l			
Copper mg/l			
Iron mg/l			
Lead mg/l	/ 0.10	0.12	0.
Lithium mg/l			
Magnesium mg/l			
Manganese mg/l			
Mercury ug/l			
Nickel mg/l			
Potassium mg/l			
Silver mg/l			
Sodium mg/l			
Strontium mg/l			
Tin mg/l			
Zinc mg/l			

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E.P.A. D.L.P.C.
STATE OF ILLINOIS

Our methods are in accordance with the current Public Health Association, Standard Methods 15th Edition.

ANALYSIS CERTIFIED BY _____, Director Date 1/12/84 ak

SUBURBAN LABORATORIES, Inc.

CHEMICAL ANALYSTS SINCE 1936

4140 LITT DRIVE • Phone 312/544-3260 • HILLSIDE, ILLINOIS 60162

Certifications: U.S.D.A. #1783 • Ill. Dept. of Public Health #17135 • Amer. Spice Trade Assn. • F.D.A. Reg. #50298 • Ill. EPA #100121

ANALYSIS REPORT

NO. #5429, #5430, #54

John Yates & Associates
Attn: Mr. John Yates
320 South Sunset Avenue
La Grange, Illinois 60525

RECEIVED
SEP 25 1984
IEPA-DLPC

P.O. No. _____

mple Recd. 5/22/84 Tests Completed 6/1/84

SAMPLE INFORMATION

urce Re: Terracon Consultants, P.O. Box #2025, Davenport, IA. 52809, Job #783563-1

#5429 - Upstream, Proj. Polo, 5/18/84
#5430 - Midstream, Proj. Polo, 5/18/84
#5431 - Downstream, Proj. Polo, 5/18/84 (+) by HGA

mpling Method: By Client X By Sub. Lab. _____ Serco Auto-Sampler _____ Other _____

ANALYSIS

		#5429	#5430	#5431			#5429	#5430	#54
otal Solids	mg/l				Nitrogen-Tot	mg/l			
x. Tot. Sol.	mg/l				Nitrogen-Amm	mg/l			
ol. Tot. Sol.	mg/l				Nitrogen-Org	mg/l			
iss. Solids	mg/l	660	540	576	Nitrite	mg/l			
ttle. Sol.	ml/l				Nitrate	mg/l			
ot. Sus. Sol.	mg/l				Phosphate (Total)	mg/l			
ix. Sus. Sol.	mg/l				Phosphate (Ortho)	mg/l			
ol. Sus. Sol.	mg/l				Sulfate	mg/l			
					Sulfide	mg/l			
OD	mg/l				Sulfite	mg/l			
OD	mg/l	105	37	27	Aluminum	mg/l			
O	mg/l				Antimony	mg/l			
					Arsenic	mg/l			
henols	ug/l				Barium	mg/l			
BAS	mg/l				Beryllium	mg/l			
ils & Greases	mg/l				Boron	mg/l			
					Cadmium	mg/l			
ot. Bact.	Cells/100 ml				Calcium	mg/l			
ot. Coli.	Cells/100 ml			(+)	Chrom-Total	ppm ~~mg/l~~	0.005	0.001	/ 0
ecal Coli.	Cells/100 ml				Chrom-Hex.	mg/l			
					Chrom-Tri.	mg/l			
H		7.0	7.3	7.7	Copper	mg/l			
pec. Cond.	umhos/cm	1000	880	920	Iron	mg/l			
lkalinity	mg/l as $CaCO_3$	444	370	458(+)	Lead	ppm ~~mg/l~~	0.006	0.005	0
cidity	mg/l as $CaCO_3$				Lithium	mg/l			
ot. Hard.	mg/l as $CaCO_3$				Magnesium	mg/l			
esid. Cl_2	mg/l				Manganese	mg/l			
romide	mg/l				Mercury	ug/l			
hloride	mg/l				Nickel	mg/l			
luoride	mg/l				Potassium	mg/l			
de-Total	mg/l				Silver	mg/l			
yanide-Free	mg/l				Sodium	mg/l			
					Strontium	mg/l			
					Tin	mg/l			
					Zinc	mg/l			

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Director

Retyped 7/19/84 ak

Date

SUBURBAN LABORATORIES, Inc.

CHEMICAL ANALYSTS SINCE 1936

4140 LITT DRIVE • Phone 312/544-3260 • HILLSIDE, ILLINOIS 60162

Certifications: U.S.D.A. #1783 • Ill. Dept. of Public Health #17135 • Amer. Spice Trade Assn. • F.D.A. Reg. #50298 • Ill. EPA #100191

ANALYSIS REPORT

NO. #5432, #5433, #

John Yates & Associates
Attn: Mr. John Yates
320 South Sunset Avenue
La Grange, Illinois 60525

RECEIVED
SEP 25 1984
IEPA-DLPC

P.O. No. _____

Sample Recd. 5/22/84 Tests Completed 6/1 /84

SAMPLE INFORMATION

Source Re: Terracon Consultants, P.O. Box #2025, Davenport, Ia. 52809, Job #78356-1

#5432 - #MW-1, Proj. Polo, 5/18/84
#5433 - #MW-2, Proj. Polo, 5/18/84
#5434 - #MW-3, Proj. Polo, 5/18/84 (+) by HGA

Sampling Method: By Client X By Sub. Lab. _____ Serco Auto-Sampler _____ Other _____

ANALYSIS

	#5432	#5433	#5434		#5432	#5433	#5
Total Solids mg/l				Nitrogen-Tot mg/l			
Fix. Tot. Sol. mg/l				Nitrogen-Amm mg/l			
Vol. Tot. Sol. mg/l				Nitrogen-Org mg/l			
Diss. Solids mg/l	764	576	556	Nitrite mg/l			
Settle. Sol. ml/l				Nitrate mg/l			
Tot. Sus. Sol. mg/l				Phosphate (Total) mg/l			
Fix. Sus. Sol. mg/l				Phosphate (Ortho) mg/l			
Vol. Sus. Sol. mg/l				Sulfate mg/l			
				Sulfide mg/l			
BOD mg/l				Sulfite mg/l			
COD mg/l	360	10	135	Aluminum mg/l			
DO mg/l				Antimony mg/l			
				Arsenic mg/l			
Phenols ug/l				Barium mg/l			
MBAS mg/l				Beryllium mg/l			
Oils & Greases mg/l				Boron mg/l			
				Cadmium mg/l			
Tot. Bact. Cells/100 ml				Calcium mg/l			
Tot. Coli. Cells/100 ml			(+)	Chrom-Total ppm ~~mg/l~~	0.002	/ 0.001	
Fecal Coli. Cells/100 ml				Chrom-Hex. mg/l			
				Chrom-Tri. mg/l			
pH	7.1	7.1	7.4	Copper mg/l			
Spec. Cond. umhos/cm	1100	820	700	Iron mg/l			
Alkalinity mg/l as $CaCO_3$	470	462	538 (+)	Lead mg/l	0.003	0.007	
Acidity mg/l as $CaCO_3$				Lithium mg/l			
Tot. Hard. mg/l as $CaCO_3$				Magnesium mg/l			
Resid. Cl_2 mg/l				Manganese mg/l			
Bromide mg/l				Mercury ug/l			
Chloride mg/l				Nickel mg/l			
Fluoride mg/l				Potassium mg/l			
Cyanide-Total mg/l				Silver mg/l			
Cyanide-Free mg/l				Sodium mg/l			
				Strontium mg/l			
				Tin mg/l			
				Zinc mg/l			

Our methods are in accordance with the American Public Health Association, Standard Methods 15th Edition

Director

Retyped

SUBURBAN LABORATORIES, Inc.

CHEMICAL ANALYSTS SINCE 1936

4140 LITT DRIVE • Phone 312/544-3260 • HILLSIDE, ILLINOIS 60162

Certifications: U.S.D.A. #1783 • Ill. Dept. of Public Health #17135 • Amer. Spice Trade Assn. • F.D.A. Reg. #50298 • Ill. EPA #100191

ANALYSIS REPORT

NO. #5435, #5436, #5437

COPY

John Yates & Associates
Attn: Mr. John Yates
320 South Sunset Avenue
La Grange, Illinois 60525

RECEIVED
SEP 25 1984

P.O. No. _____

ample Recd. 5/22/84 Tests Completed IEPA-DLPC 6/1/84

SAMPLE INFORMATION

ource Re: Terracon Consultants, P.O. Box #2025, Davenport, Ia, 52809, Job #783563-1

#5435 - #MW-4, Proj. Polo, 5/18/84
#5436 - #MW-4d Proj. Polo, 5/18/84
#5437 - #MW-5, Proj. Polo, 5/18/84 (+) by HGA

ampling Method: By Client X By Sub. Lab. _____ Serco Auto-Sampler _____ Other _____

ANALYSIS

	#5435	#5436	#5437
Total Solids mg/l			
Fix. Tot. Sol. mg/l			
Vol. Tot. Sol. mg/l			
Diss. Solids mg/l	760	752	552
Settle. Sol. ml/l			
Tot. Sus. Sol. mg/l			
Fix. Sus. Sol. mg/l			
Vol. Sus. Sol. mg/l			
BOD mg/l			
COD mg/l	743	46	368
DO mg/l			
Phenols ug/l			
MBAS mg/l			
Oils & Greases mg/l			
Tot. Bact. Cells/100 ml			
Tot. Coli. Cells/100 ml			(+)
Fecal Coli. Cells/100 ml			
pH	6.9	6.9	6.9
Spec. Cond. umhos/cm	1050	1080	800
Alkalinity mg/l as $CaCO_3$	622	568	358 (+)
Acidity mg/l as $CaCO_3$			
Tot. Hard. mg/l as $CaCO_3$			
Resid. Cl_2 mg/l			
Bromide mg/l			
Chloride mg/l			
Fluoride mg/l			
Cyanide-Total mg/l			
Cyanide-Free mg/l			

	#5435	#5436	#5437
Nitrogen-Tot mg/l			
Nitrogen-Amm mg/l			
Nitrogen-Org mg/l			
Nitrite mg/l			
Nitrate mg/l			
Phosphate (Total) mg/l			
Phosphate (Ortho) mg/l			
Sulfate mg/l			
Sulfide mg/l			
Sulfite mg/l			
Aluminum mg/l			
Antimony mg/l			
Arsenic mg/l			
Barium mg/l			
Beryllium mg/l			
Boron mg/l			
Cadmium mg/l			
Calcium mg/l			
Chrom-Total ppm ~~mg/l~~	0.002	0.003	/
Chrom-Hex. mg/l			
Chrom-Tri. mg/l			
Copper mg/l			
Iron mg/l			
Lead ppm ~~mg/l~~	0.006	0.006	
Lithium mg/l			
Magnesium mg/l			
Manganese mg/l			
Mercury ug/l			
Nickel mg/l			
Potassium mg/l			
Silver mg/l			
Sodium mg/l			
Strontium mg/l			
Tin mg/l			
Zinc mg/l			

Our methods are in accordance with the American Public Health Association, Standard Methods 15th Edition

Retyped

SUBURBAN LABORATORIES, Inc.

CHEMICAL ANALYSTS SINCE 1936

4140 LITT DRIVE • Phone 312/544-3260 • HILLSIDE, ILLINOIS 60162

Certifications: U.S.D.A. #1783 • Ill. Dept. of Public Health #17135 • Amer. Spice Trade Assn. • F.D.A. Reg. 350296 • Ill. EPA 3100191

ANALYSIS REPORT

NO. #5438

John Yates & Associates
Attn: Mr. John Yates
320 South Sunset Avenue
La Grange, Illinois 60525

RECEIVED
SEP 25 1984
IEPA-DLPC

P.O. No. _____

mple Recd. 5/22/84 Tests Completed 6/1/84

SAMPLE INFORMATION

ource Re: Terracon Consultants, P.O. Box #2025, Davenport, Ia., Job #783563-1

#5438 - #MW-6, Proj. Polo, 5/18/84

(+) by HGA

mpling Method: By Client X By Sub. Lab. _____ Serco Auto-Sampler _____ Other _____

ANALYSIS

		#5438					#5438		
Total Solids	mg/l				Nitrogen-Tot	mg/l			
Fix. Tot. Sol.	mg/l				Nitrogen-Amm	mg/l			
Vol. Tot. Sol.	mg/l				Nitrogen-Org	mg/l			
Diss. Solids	mg/l	1024			Nitrite	mg/l			
Settle. Sol.	ml/l				Nitrate	mg/l			
Tot. Sus. Sol.	mg/l				Phosphate (Total)	mg/l			
Fix. Sus. Sol.	mg/l				Phosphate (Ortho)	mg/l			
Vol. Sus. Sol.	mg/l				Sulfate	mg/l			
					Sulfide	mg/l			
BOD	mg/l				Sulfite	mg/l			
COD	mg/l	1267			Aluminum	mg/l			
DO	mg/l				Antimony	mg/l			
					Arsenic	mg/l			
Phenols	ug/l				Barium	mg/l			
MBAS	mg/l				Beryllium	mg/l			
Oils & Greases	mg/l				Boron	mg/l			
					Cadmium	mg/l			
Tot. Bact.	Cells/100 ml				Calcium	mg/l			
Tot. Coli.	Cells/100 ml			(+)	Chrom-Total	ppm	0.002		
Fecal Coli.	Cells/100 ml				Chrom-Hex.	mg/l			
					Chrom-Tri.	mg/l			
pH		7.1			Copper	mg/l			
Spec. Cond.	umhos/cm	1400			Iron	mg/l			
Alkalinity	mg/l as $CaCO_3$	928		(+)	Lead	ppm	0.003		
Acidity	mg/l as $CaCO_3$				Lithium	mg/l			
Tot. Hard.	mg/l as $CaCO_3$				Magnesium	mg/l			
Resid. Cl_2	mg/l				Manganese	mg/l			
Bromide	mg/l				Mercury	ug/l			
Chloride	mg/l				Nickel	mg/l			
Fluoride	mg/l				Potassium	mg/l			
Cyanide-Total	mg/l				Silver	mg/l			
Cyanide-Free	mg/l				Sodium	mg/l			
					Strontium	mg/l			
					Tin	mg/l			
					Zinc	mg/l			

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Retyped

SUBURBAN LABORATORIES, Inc.

CHEMICAL ANALYSTS SINCE 1936

4140 LITT DRIVE • Phone 312/544-3260 • HILLSIDE, ILLINOIS 60162

Certifications: U.S.D.A. #1783 • Ill. Dept. of Public Health #17135 • Amer. Spice Trade Assn. • F.D.A. Reg. #50296 • Ill. EPA #100191

NO. 11637

John Yates & Associates
Attn: Mr. John Yates
320 South Sunset Avenue
La Grange, Illinois 60525

P.O. No. _____

Sample Recd. 12/23/83 Tests Completed 1/11/84

SAMPLE INFORMATION

Source Re: Mr. Dave Cook, Terracon Consultants, P.O. Box #2025, Davenport, IA 52809 Job #783

S/L #11637 - Composite- Boring #5, Sample #1, Depth 0.5-1.5
Boring #5, Sample #2, Depth 2.0-3.0
Boring #5, Sample #3, Depth 3.5-4.5

Sampling Method: By Client X By Sub. Lab. _____ Serco Auto-Sampler _____ Other _____

ANALYSIS

E.P. Toxicity

		#11637					#11637		
Total Solids	mg/l				Nitrogen-Tot	mg/l			
Fix. Tot. Sol.	mg/l				Nitrogen-Amm	mg/l			
Vol. Tot. Sol.	mg/l				Nitrogen-Org	mg/l			
Diss. Solids	mg/l				Nitrite	mg/l			
Settle. Sol.	ml/l				Nitrate	mg/l			
Tot. Sus. Sol.	mg/l				Phosphate (Total)	mg/l			
Fix. Sus. Sol.	mg/l				Phosphate (Ortho)	mg/l			
Vol. Sus. Sol.	mg/l				Sulfate	mg/l			
					Sulfide	mg/l			
BOD	mg/l				Sulfite	mg/l			
COD	mg/l				Aluminum	mg/l			
OO	mg/l				Antimony	mg/l			
					Arsenic	mg/l	0.020		
Phenols	ug/l				Barium	mg/l	1.0		
MBAS	mg/l				Beryllium	mg/l			
Oils & Greases	mg/l				Boron	mg/l			
					Cadmium	mg/l	/ 0.10		
Tot. Bact.	Cells/100 ml				Calcium	mg/l			
Tot. Coli.	Cells/100 ml				Chrom-Total	mg/l	/ 0.10		
Fecal Coli.	Cells/100 ml				Chrom-Hex.	mg/l			
					Chrom-Tri.	mg/l			
pH		6.8			Copper	mg/l			
Spec. Cond.	umhos/cm				Iron	mg/l			
Alkalinity	-ppmas $CaCO_3$	930			Lead	mg/l	/ 0.10		
Acidity	mg/l as $CaCO_3$				Lithium	mg/l			
Tot. Hard.	mg/l as $CaCO_3$				Magnesium	mg/l			
Resid. Cl_2	mg/l				Manganese	mg/l			
Bromide	mg/l				Mercury	mg/l	/ 0.0001		
Chloride	mg/l				Nickel	mg/l			
Fluoride	mg/l				Potassium	mg/l			
Cyanide-Total	mg/l				Silver	mg/l	/ 0.10		
Cyanide-Free	mg/l				Sodium	mg/l			
Xylene (Raw)	ppm	2.3			Strontium	mg/l			
					Selenium	mg/l	0.022		
					Zinc	mg/l			

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APR 28 1984
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ILLINOIS

Our methods are in accordance with the American Public Health Association, Standard Methods 15th Edition.

_____ Director

Date: 1/12/84 ak

SUBURBAN LABORATORIES, Inc.

CHEMICAL ANALYSTS SINCE 1936

4140 LITT DRIVE • Phone 312/544-3260 • HILLSIDE, ILLINOIS 60162

Certifications: U.S.D.A. #1783 • Ill. Dept. of Public Health #17135 • Amer. Spice Trade Assn. • F.D.A. Reg. #50296 • Ill. EPA #100191

ANALYSIS NO. 11638

John Yates & Associates
Attn: Mr. John Yates
320 South Sunset Avenue
La Grange, Illinois 60525

P.O. No. _____

ple Recd. 12/23/83 Tests Completed 1/11/84

SAMPLE INFORMATION

rce Re: Mr. Dave Cook, Terracon Consultants, P.O. Box #2025, Davenport, IA 52809 Job #783

Source: S/L #11638 - Soil Composite - Boring #6, Sample #1, Depth 0.5-1.5
Boring #6, Sample #2, Depth 2.0-3.0
Boring #6, Sample #3, Depth 3.5-4.5

ıpling Method: By Client X By Sub. Lab. _____ Serco Auto-Sampler _____ Other _____

ANALYSIS

						E.P. Toxicity	
						#11638	
ral Solids	mg/l			Nitrogen-Tot	mg/l		
x. Tot. Sol.	mg/l			Nitrogen-Amm	mg/l		
il. Tot. Sol.	mg/l			Nitrogen-Org	mg/l		
ss. Solids	mg/l			Nitrite	mg/l		
ttle. Sol.	ml/l			Nitrate	mg/l		
ot. Sus. Sol.	mg/l			Phosphate (Total)	mg/l		
ix. Sus. Sol.	mg/l			Phosphate (Ortho)	mg/l		
ol. Sus. Sol.	mg/l			Sulfate	mg/l		
				Sulfide	mg/l		
OD	mg/l			Sulfite	mg/l		
OD	mg/l			Aluminum	mg/l		
O	mg/l			Antimony	mg/l		
				Arsenic	mg/l	0.012	
henols	ug/l			Barium*	mg/l	1.6	
BAS	mg/l			Beryllium	mg/l		
ils & Greases	mg/l			Boron	mg/l		
				Cadmium	mg/l	/ 0.10	
ot. Bact.	Cells/100 ml			Calcium	mg/l		
ot. Coli.	Cells/100 ml			Chrom-Total	mg/l	/ 0.10	
ecal Coli.	Cells/100 ml			Chrom-Hex.	mg/l		
				Chrom-Tri.	mg/l		
H		7.6		Copper	mg/l		
ec. Cond.	umhos/cm			Iron	mg/l		
lkalinity	ppm as $CaCO_3$	1731		Lead	mg/l	/ 0.10	
cidity	mg/l as $CaCO_3$			Lithium	mg/l		
ot. Hard.	mg/l as $CaCO_3$			Magnesium	mg/l		
esid. Cl_2	mg/l			Manganese	mg/l		
romide	mg/l			Mercury	mg/l	/ 0.0001	
hloride	mg/l			Nickel	mg/l		
luoride	mg/l			Potassium	mg/l		
anide-Total	mg/l			Silver	mg/l	/ 0.10	
nide-Free	mg/l			Sodium	mg/l		
				Strontium	mg/l		
				Xxx Selenium	mg/l	0.006	
					mg/l		

RECEIVED
MAR 28 1984
P.A. — I.E.P.A.
STATE OF ILLINOIS

Our methods are in accordance with the American Public Health Association, Standard Methods 15th Edition.

NALYSIS CERTIFIED BY _____, Director Date: 1/12/84 ak

SUBURBAN LABORATORIES, Inc.

CHEMICAL ANALYSTS SINCE 1936

NO. 11639

4140 LITT DRIVE • Phone 312/544-3260 • HILLSIDE, ILLINOIS 60162

Certifications: U.S.D.A. #1783 • Ill. Dept. of Public Health #17135 • Amer. Spice Trade Assn. • F.D.A. Reg. #50206 • Ill. EPA #100191

John Yates & Associates
Attn: Mr. John Yates
320 South Sunset Avenue
La Grange, Illinois 60525

P.O. No. _____

Sample Recd. 12/23/83 Tests Completed 1/11/84

SAMPLE INFORMATION

Source Re: Mr. Dave Cook, Terracon Consultants, P.O. Box #2025, Davenport, IA 52809 Job #7835

Source: S/L #11639 - Composite - Soil - Boring #7, Sample #1, Depth 0.5-1.5
Boring #7, Sample #2, Depth 2.0-3.0
Boring #7, Sample #3, Depth 3.5-4.5

Sampling Method: By Client X By Sub. Lab. _____ Serco Auto-Sampler _____ Other _____

ANALYSIS

E.P. Toxicity #11639

Total Solids	mg/l			Nitrogen-Tot	mg/l		
Fix. Tot. Sol.	mg/l			Nitrogen-Amm	mg/l		
Vol. Tot. Sol.	mg/l			Nitrogen-Org	mg/l		
Diss. Solids	mg/l			Nitrite	mg/l		
Settle. Sol.	ml/l			Nitrate	mg/l		
Tot. Sus. Sol.	mg/l			Phosphate (Total)	mg/l		
Fix. Sus. Sol.	mg/l			Phosphate (Ortho)	mg/l		
Vol. Sus. Sol.	mg/l			Sulfate	mg/l		
				Sulfide	mg/l		
BOD	mg/l			Sulfite	mg/l		
COD	mg/l			Aluminum	mg/l		
DO	mg/l			Antimony	mg/l		
				Arsenic	mg/l	0.011	
Phenols	ug/l			Barium	mg/l	1.2	
MBAS	mg/l			Beryllium	mg/l		
Oils & Greases	mg/l			Boron	mg/l		
				Cadmium	mg/l	/ 0.10	
Tot. Bact.	Cells/100 ml			Calcium	mg/l		
Tot. Coli.	Cells/100 ml			Chrom-Total	mg/l	/ 0.10	
Fecal Coli.	Cells/100 ml			Chrom-Hex.	mg/l		
				Chrom-Tri.	mg/l		
pH		6.6		Copper	mg/l		
Spec. Cond.	umhos/cm			Iron	mg/l		
Alkalinity	ppm as $CaCO_3$	633		Lead	mg/l	/ 0.10	
Acidity	mg/l as $CaCO_3$			Lithium	mg/l		
Tot. Hard.	mg/l as $CaCO_3$			Magnesium	mg/l		
Resid. Cl_2	mg/l			Manganese	mg/l		
Bromide	mg/l			Mercury	mg/l	/ 0.0001	
Chloride	mg/l			Nickel	mg/l		
Fluoride	mg/l			Potassium	mg/l		
Cyanide-Total	mg/l			Silver	mg/l	/ 0.10	
Cyanide-Free	mg/l			Sodium	mg/l		
				Strontium	mg/l		
				Selenium	mg/l	0.003	
				Zinc	mg/l		

RECEIVED
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E.P.A. — D.L.P.C.
STATE OF ILLINOIS

Our methods are in accordance with the American Public Health Association, Standard Methods 15th Edition.

ANALYSIS CERTIFIED BY _____, Director Date: 1/12/84 ak

SUBURBAN LABORATORIES, Inc.

CHEMICAL ANALYSTS SINCE 1936

4140 LITT DRIVE • Phone 312/544-3260 • HILLSIDE, ILLINOIS 60162

Certifications: U.S.D.A. #1783 • Ill. Dept. of Public Health #17135 • Amer. Spice Trade Assn. • F.D.A. Reg. #50206 • Ill. EPA #100191

ANALYSIS REPORT

NO. 11640

John Yates & Associates
Attn: Mr. John Yates
320 South Sunset Avenue
La Grange, Illinois 60525

P.O. No. _____

Sample Recd. 12/23/83 Tests Completed 1/11/84

SAMPLE INFORMATION

Source Re: Mr. Dave Cook, Terracon Consultants, P.O. Box #2025, Davenport, IA 52809 Job #783

S/L #11640 - Composite - Boring #8, Sample #1, Depth 0.5-1.5
Boring #8, Sample #2, Depth 2.0-3.0
Boring #8, Sample #3, Depth 3.5-4.5

Sampling Method: By Client X By Sub. Lab. _____ Serco Auto-Sampler _____ Other _____

ANALYSIS — E.P. Toxicity

						#11640	
Total Solids	mg/l			Nitrogen-Tot	mg/l		
Fix. Tot. Sol.	mg/l			Nitrogen-Amm	mg/l		
Vol. Tot. Sol.	mg/l			Nitrogen-Org	mg/l		
Diss. Solids	mg/l			Nitrite	mg/l		
Settle. Sol.	ml/l			Nitrate	mg/l		
Tot. Sus. Sol.	mg/l			Phosphate (Total)	mg/l		
Fix. Sus. Sol.	mg/l			Phosphate (Ortho)	mg/l		
Vol. Sus. Sol.	mg/l			Sulfate	mg/l		
				Sulfide	mg/l		
BOD	mg/l			Sulfite	mg/l		
COD	mg/l			Aluminum	mg/l		
DO	mg/l			Antimony	mg/l		
				Arsenic	mg/l	0.008	
Phenols	ug/l			Barium	mg/l	/ 1.0	
MBAS	mg/l			Beryllium	mg/l		
Oils & Greases	mg/l			Boron	mg/l		
				Cadmium	mg/l	/ 0.10	
Tot. Bact.	Cells/100 ml			Calcium	mg/l		
Tot. Coli.	Cells/100 ml			Chrom-Total	mg/l	/ 0.10	
Fecal Coli.	Cells/100 ml			Chrom-Hex.	mg/l		
				Chrom-Tri.	mg/l		
pH		7.0		Copper	mg/l		
Spec. Cond.	umhos/cm			Iron	mg/l		
Alkalinity	ppm as $CaCO_3$	592		Lead	mg/l	/ 0.10	
Acidity	mg/l as $CaCO_3$			Lithium	mg/l		
Tot. Hard.	mg/l as $CaCO_3$			Magnesium	mg/l		
Resid. Cl_2	mg/l			Manganese	mg/l		
Bromide	mg/l			Mercury	mg/l	/ 0.0001	
Chloride	mg/l			Nickel	mg/l		
Fluoride	mg/l			Potassium	mg/l		
anide-Total	mg/l			Silver	mg/l	/ 0.10	
Cyanide-Free	mg/l			Sodium	mg/l		
				Strontium	mg/l		
				Selenium	mg/l	0.027	
				Zinc	mg/l		

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STATE OF ILLINOIS

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Director Date 1/12/84 ak

SUBURBAN LABORATORIES, Inc.

CHEMICAL ANALYSTS SINCE 1936

4140 LITT DRIVE • Phone 312/544-3260 • HILLSIDE, ILLINOIS 60162

Certifications: U.S.D.A. #1783 • Ill. Dept. of Public Health #17135 • Amer. Spice Trade Assn. • F.D.A. Reg. #50296 • Ill. EPA #100191

ANALYSIS NO. 22641

REPORT TO:
John Yates & Associates
Attn: Mr. John Yates
320 South Sunset Avenue
La Grange, Illinois 60525

P.O. No. _____

Sample Recd. 12/23/83 Tests Completed 1/11/84

SAMPLE INFORMATION

Source Re: Mr. Dave Cook, Terracon Consultants, P.O. Box #2025, Davenport, IA 52809 Job #78

S/L #11641 - Composite - Boring #9, Sample #1, Depth 0.5-1.5
Boring #9, Sample #2, Depth 2.0-3.0
Boring #9, Sample #3, Depth 3.5-4.5

Sampling Method: By Client X By Sub. Lab. _____ Serco Auto-Sampler _____ Other _____

ANALYSIS

						E.P. Toxicity		
						#11641		
Total Solids	mg/l				Nitrogen-Tot	mg/l			
Fix. Tot. Sol.	mg/l				Nitrogen-Amm	mg/l			
Vol. Tot. Sol.	mg/l				Nitrogen-Org	mg/l			
Diss. Solids	mg/l				Nitrite	mg/l			
Settle. Sol.	ml/l				Nitrate	mg/l			
Tot. Sus. Sol.	mg/l				Phosphate (Total)	mg/l			
Fix. Sus. Sol.	mg/l				Phosphate (Ortho)	mg/l			
Vol. Sus. Sol.	mg/l				Sulfate	mg/l			
					Sulfide	mg/l			
BOD	mg/l				Sulfite	mg/l			
COD	mg/l				Aluminum	mg/l			
DO	mg/l				Antimony	mg/l			
					Arsenic	mg/l	0.003		
Phenols	ug/l				Barium	mg/l	/ 1.0		
MBAS	mg/l				Beryllium	mg/l			
Oils & Greases	mg/l				Boron	mg/l			
					Cadmium	mg/l	/ 0.10		
Tot. Bact.	Cells/100 ml				Calcium	mg/l			
Tot. Coli.	Cells/100 ml				Chrom-Total	mg/l	/ 0.10		
Fecal Coli.	Cells/100 ml				Chrom-Hex.	mg/l			
					Chrom-Tri.	mg/l			
pH		6.4			Copper	mg/l			
Spec. Cond.	umhos/cm				Iron	mg/l			
Alkalinity	ppm as $CaCO_3$	476			Lead	mg/l	/ 0.10		
Acidity	mg/l as $CaCO_3$				Lithium	mg/l			
Tot. Hard.	mg/l as $CaCO_3$				Magnesium	mg/l			
Resid. Cl_2	mg/l				Manganese	mg/l			
Bromide	mg/l				Mercury	mg/l	/ 0.0001		
Chloride	mg/l				Nickel	mg/l			
Fluoride	mg/l				Potassium	mg/l			
Cyanide-Total	mg/l				Silver	mg/l	/ 0.10		
Cyanide-Free	mg/l				Sodium	mg/l			
					Strontium	mg/l			
					Selenium	mg/l	0.026		
					Zinc	mg/l			

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STATE OF ILLINOIS

Our methods are in accordance with the American Public Health Association, Standard Methods 15th Edition.

ANALYSIS CERTIFIED BY _____, Director Date: 1/12/84 ak

SOIL SAMPLES
EP-TOX

Telephone (312) 544-3200

SUBURBAN LABORATORIES, Inc.

4140 LITT DRIVE HILLSIDE, ILLINOIS 60162 - 1183

EARL I. ROSENBERG
President

H.R. THOMAS, JR.
Director

June 1, 1984

John Yates & Associates
320 South Sunset Avenue
La Grange, Illinois 60525

Attention: Mr. John Yates

Re: Terracon Consultants, Inc.
Davenport, Iowa - Soil Samples

Samples Received: 4/25/84	pH	Lead (ppm)	(ppm) Chrom-Total	(ppm as $CaCO_3$) Alkalinity
S/L #4350 - Sample #B5A-1	7.6	< 0.10	< 0.10	1086
S/L #4351 - Sample #B5A-2	7.1	< 0.10	< 0.10	1809
S/L #4352 - Sample #B5A-3	6.9	< 0.10	< 0.10	1428
S/L #4353 - Sample #B6A-1	8.1	< 0.10	< 0.10	7118
S/L #4354 - Sample #B6A-2	8.3	< 0.10	< 0.10	20725
S/L #4355 - Sample #B6A-3	8.1	< 0.10	< 0.10	2276
S/L #4356 - Sample #B7A-1	7.8	< 0.10	< 0.10	3619
S/L #4357 - Sample #B7A-2	6.85	< 0.10	< 0.10	1130
S/L #4358 - Sample #B7A-3	6.5	< 0.10	< 0.10	1010
S/L #4359 - Sample #B-10-1	8.3	< 0.10	< 0.10	19268
S/L #4360 - Sample #B-10-2	7.4	< 0.10	< 0.10	4540
S/L #4361 - Sample #B-10-3	7.3	< 0.10	< 0.10	2642
S/L #4362 - Sample #B-11-1	7.3	< 0.10	< 0.10	1761
S/L #4363 - Sample #B-11-2	6.95	< 0.10	< 0.10	1015
S/L #4364 - Sample #B-11-3	8.0	< 0.10	< 0.10	19034
S/L #4365 - Sample #B-12-1	7.5	< 0.10	< 0.10	1046
S/L #4366 - Sample #B-12-2	7.7	< 0.10	< 0.10	16526
S/L #4367 - Sample #B-12-3	7.9	< 0.10	< 0.10	19569
S/L #4368 - Sample #B-13-1	7.6	< 0.10	< 0.10	7112
S/L #4369 - Sample #B-13-2	7.5	< 0.10	< 0.10	2734
S/L #4370 - Sample #B-13-3	6.85	< 0.10	< 0.10	1323
S/L #4371 - Sample #8A-1-0-2	7.55	< 0.10	< 0.10	4148
S/L #4272- Sample #8A-2-2-3-5	6.5	< 0.10	< 0.10	1015
S/L #4373 - Sample #8A-3-3-5-5	6.6	< 0.10	< 0.10	907

(Continued)

Samples Received: 4/25/84	pH	Lead (ppm)	(ppm) Chrom-Total	(ppm as CaC(Alkalinit
S/L #4374 - Sample #9A-1 0-2	7.4	< 0.10	< 0.10	2334
S/L #4375 - Sample #9A-2-2-3-5	5.3	< 0.10	< 0.10	404
S/L #4376 - Sample #9A-3-3-5-5	5.9	< 0.10	< 0.10	255
S/L #4377 - Sample #14-1 0-2	7.75	< 0.10	< 0.10	3640
S/L #4378 - Sample #14-2 2-3-5	7.4	< 0.10	< 0.10	1848
S/L #4379 - Sample #14-3 3-5-5	7.5	< 0.10	< 0.10	753

ANALYSIS CERTIFIED BY: _____, Director(HRT/ak)
Retyped

SOIL SAMPLES
ACID DIGESTION

Telephone 312 544 3[illegible]

SUBURBAN LABORATORIES, Inc.

4140 LITT DRIVE HILLSIDE, ILLINOIS 60162 · 1183

EARL I. ROSENBERG
President

H.R THOMAS
Director

May 10, 1984

John Yates & Associates
320 South Sunset Avenue
La Grange, Illinois 60525

Attention: Mr. John Yates

Re: Terracon Consultants, Inc.
Davenport, Iowa - Soil Samp

Samples Received: 4/25/84	pH	Lead (ppm)	(ppm) Chrom-Total	(ppm as C Alkalir
S/L #4350 - Sample #B5A-1	7.6	21.0	15.0	1086
S/L #4351 - Sample #B5A-2	7.1	13.0	14.0	1809
S/L #4352 - Sample #B5A-3	6.9	12.5	16.5	1428
S/L #4353 - Sample #B6A-1	8.1	18.0	16.5	7118
S/L #4354 - Sample #B6A-2	8.3	66.5	31.5	20725
S/L #4355 - Sample #B6A-3	8.1	16.6	22.0	2276
S/L #4356 - Sample #B7A-1	7.8	60.5	23.0	3619
S/L #4357 - Sample #B7A-2	6.85	35.0	21.0	1130
S/L #4358 - Sample #B7A-3	6.5	16.5	22.0	1010
S/L #4359 - Sample #B-10-1	8.3	30.5	16.5	19268
S/L #4360 - Sample #B-10-2	7.4	15.5	15.5	4540
S/L #4361 - Sample #B-10-3	7.3	8.5	16.5	2642
S/L #4362 - Sample #B-11-1	7.3	69.0	18.5	1761
S/L #4363 - Sample #B-11-2	6.95	7.5	6.0	1015
S/L #4364 - Sample #B-11-3	8.0	14.5	17.0	19034
S/L #4365 - Sample #B-12-1	7.5	13.0	17.5	1046
S/L #4366 - Sample #B-12-2	7.7	12.0	9.00	16526
S/L #4367 - Sample #B-12-3	7.9	17.0	14.0	19569
S/L #4368 - Sample #B-13-1	7.6	455	91.0	7112
S/L #4369 - Sample #B-13-2	7.5	62.5	17.0	2734
S/L #4370 - Sample #B-13-3	6.85	44.5	16.5	1323
S/L #4371 - Sample #8A-1-0-2	7.55	32.5	610	4148
S/L #4372 - Sample #8A-2-2-3-5	6.5	8.5	6.0	1015
S/L #4373 - Sample #8A 3-3-5-5	6.6	12.0	14.5	907

(Continued)

Samples Received: 4/25/84		pH	Lead (ppm)	(ppm) Chrom-Total	(ppm as CaCO Alkalinity
S/L #4374 - Sample #9A-1	0-2	7.4	39.0	20.5	2334
S/L #4375 - Sample #9A-2	2-3-5	5.3	14.5	16.5	404
S/L #4376 - Sample #9A-3	3-5-5	5.9	24.0	37.0	255
S/L #4377 - Sample #14-1	0-2	7.75	28.5	29.0	2640
S/L #4378 - Sample #14-2	2-3-5	7.4	14.5	12.0	1848
S/L #4379 - Sample #14-3	3-5-5	7.5	22.0	19.0	753

ANALYSIS CERTIFIED BY: _____, Director(HRT/ak)

ATTACHMENT E

1986 AND 1987 GROUND WATER AND SURFACE WATER ANALYSES

(Source: Yates and Auberle, 1987)

TABLE 1
DISSOLVED LEAD CONCENTRATIONS
MG/L

IEPA POINT	4/9/86	7/3/86	10/1/86	1/2/87	4/8/87
G101	.03	.04	.03	.03	.015
G102	.02	.02	.03	.03	<.004
G103	<.01	.02	.02	<.01	.004
G104	.04	.03	.03	.03	.004
G105	.02	.03	.02	.01	.004
G106	.03	.04	.05	.03	.01
G04D	.02	.03	.02	.03	<.004

TABLE 2
TOTAL LEAD CONCENTRATIONS
MG/L

IEPA POINT	4/9/86	7/3/86	10/1/86	1/2/87	4/8/87
S101		.02	.04	*	.36
S201		.03	.03	.03	.091
S301		.04	.03	.09	<.05

TABLE 3
DISSOLVED LEAD CONCENTRATIONS
MG/L

IEPA POINT	4/9/86	7/3/86	10/1/86	1/2/87	4/8/87
S101					0.4
S201					.011
S301					.011

* No sample taken, water frozen.

RECEIVED
JUN - 1 1987
IEPA-DLPC

TABLE 4
DISSOLVED CHROMIUM CONCENTRATIONS
MG/L

IEPA POINT	4/9/86	7/3/86	10/1/86	1/2/87	4/8/87
G101	<.01	<.01	<.01	<.01	<.05
G102	<.01	<.01	<.01	<.01	<.05
G103	<.01	<.01	<.01	<.01	<.05
G104	<.01	<.01	<.01	<.01	<.05
G105	<.01	<.01	<.01	<.01	<.05
G106	<.01	<.01	<.01	<.01	<.05
G04D	<.01	<.01	<.01	<.01	<.05

TABLE 5
TOTAL CHROMIUM CONCENTRATIONS
MG/L

IEPA POINT	4/9/86	7/3/86	10/1/86	1/2/87	4/8/87
S101		<.01	<.01	*	.057
S201		<.01	<.01	<.01	<.05
S301		<.01	<.01	<.01	<.05

TABLE 6
DISSOLVED CHROMIUM CONCENTRATIONS
MG/L

IEPA POINT	4/9/86	7/3/86	10/1/86	1/2/87	4/8/87
S101					<.02
S201					<.02
S301					<.02

* Sample not taken, water frozen.

ATTACHMENT F

1992 GROUND WATER ANALYSES

(Source: Star, 1992)

NATIONAL ENVIRONMENTAL TESTING, INC.

NET Midwest, Inc.
Rockford Division
3548 35th Street
Rockford, IL 61109
Tel: (815) 874-2171
Fax: (815) 874-5622

ANALYTICAL REPORT

Mr. Greg Unger
STAR ENVIRONMENTAL CONSULT
225 N. JEFFERSON
P.O. BOX 206
Amboy, IL 61310

07/06/1992

JOB NUMBER: 92.1951

The Following samples were received by NET for analysis:

Sample Number	Sample Description	Date Taken
105244	Composite Sample Well #4,5,6	06/09/1992

The abbreviations and references listed below have been adopted by NET as standard conventions and are used throughout this report:

(1) Method reference from EPA SW-846 "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," USEPA SW-846, 3rd Ed., September, 1986.

(2) Method reference from ASTM, "American Society for Testing Materials."

(3) Method reference from EPA "Methods for Chemical Analysis of Waters and Wastes," USEPA, EPA 600/4-79-020, revised March, 1983.

(4) Method reference from "Standard Methods for the Examination of Water and Wastewater."

(5) Method reference from EPA "Methods for the Determination of Organic Compounds in Drinking Water," USEPA, 524.2, Revised 1989.

(6) EPA 40 CFR, Part 763 Appendix A to Subpart F - PLM

NATIONAL ENVIRONMENTAL TESTING, INC.

NET Midwest, Inc
Rockford Division
3548 35th Street
Rockford, IL 61109
Tel: (815) 874-2171
Fax: (815) 874-5622

ANALYTICAL REPORT

Mr. Greg Unger
STAR ENVIRONMENTAL CONSULT
225 N. JEFFERSON
P.O. BOX 206
Amboy, IL 61310

07/06/1992

Job No: 92.1951
Sample No: 105244

SAMPLE DESCRIPTION: Composite Sample Well #4,5,6
Central Quality

Date Taken: 06/09/1992
IEPA Cert. No.100220

Date Received: 06/15/1992
WDNR Cert. No.999447240

TEST NAME	RESULTS	UNITS	METHODS	DATE ANALYZED
VOLATILE COMPOUNDS - 8240				
Acrolein	<100.	ug/L	8240 (1)	06/22/1992
Acrylonitrile	<10.	ug/L	8240 (1)	06/22/1992
Benzene	<1.0	ug/L	8240 (1)	06/22/1992
Bromodichloromethane	<1.0	ug/L	8240 (1)	06/22/1992
Bromoform	<1.0	ug/L	8240 (1)	06/22/1992
Bromomethane	<10.	ug/L	8240 (1)	06/22/1992
Carbon tetrachloride	<1.0	ug/L	8240 (1)	06/22/1992
Chlorobenzene	<1.0	ug/L	8240 (1)	06/22/1992
Chloroethane	<10.	ug/L	8240 (1)	06/22/1992
2-Chloroethyl vinyl ether	<2.0	ug/L	8240 (1)	06/22/1992
Chloroform	<1.0	ug/L	8240 (1)	06/22/1992
Chloromethane	<10.	ug/L	8240 (1)	06/22/1992
Dibromochloromethane	<1.0	ug/L	8240 (1)	06/22/1992
1,1-Dichloroethane	<1.0	ug/L	8240 (1)	06/22/1992
1,2-Dichloroethane	<1.0	ug/L	8240 (1)	06/22/1992
1,1-Dichloroethene	<1.0	ug/L	8240 (1)	06/22/1992
trans-1,2-Dichloroethene	<1.0	ug/L	8240 (1)	06/22/1992
1,2-Dichloropropane	<1.0	ug/L	8240 (1)	06/22/1992
cis-1,3-Dichloropropene	<1.0	ug/L	8240 (1)	06/22/1992
trans-1,3-Dichloropropene	<1.0	ug/L	8240 (1)	06/22/1992
Ethylbenzene	<1.0	ug/L	8240 (1)	06/22/1992
Methylene chloride	<5.0	ug/L	8240 (1)	06/22/1992
1,1,2,2-Tetrachloroethane	<1.0	ug/L	8240 (1)	06/22/1992
Tetrachloroethene	<1.0	ug/L	8240 (1)	06/22/1992

Brian Wanner, Manager
Rockford Division

NATIONAL ENVIRONMENTAL TESTING, INC.

NET Midwest, Inc.
Rockford Division
3548 35th Street
Rockford, IL 61109
Tel: (815) 874-2171
Fax: (815) 874-5622

ANALYTICAL REPORT

Mr. Greg Unger
STAR ENVIRONMENTAL CONSULT
225 N. JEFFERSON
P.O. BOX 206
Amboy, IL 61310

07/06/1992

Job No: 92.1951
Sample No: 105244

SAMPLE DESCRIPTION: Composite Sample Well #4,5,6
Central Quality

Date Taken: 06/09/1992
IEPA Cert. No.100220

Date Received: 06/15/1992
WDNR Cert. No.999447240

TEST NAME	RESULTS	UNITS	METHODS	DATE ANALYZED
Toluene	<1.0	ug/L	8240 (1)	06/22/1992
1,1,1-Trichloroethane	<1.0	ug/L	8240 (1)	06/22/1992
1,1,2-Trichloroethane	<1.0	ug/L	8240 (1)	06/22/1992
Trichloroethene	<1.0	ug/L	8240 (1)	06/22/1992
Vinyl chloride	<10.	ug/L	8240 (1)	06/22/1992

Brian Wanner, Manager
Rockford Division

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225 N. JEFFERSON
P.O. BOX 206
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07/06/1992

Job No: 92.1951
Sample No: 105244

SAMPLE DESCRIPTION: Composite Sample Well #4,5,6
Central Quality

Date Taken: 06/09/1992
IEPA Cert. No.100220

Date Received: 06/15/1992
WDNR Cert. No.999447240

TEST NAME	RESULTS	UNITS	METHODS	DATE ANALYZED
Dichlorodifluoromethane	<1.0	ug/L	8240 (1)	06/22/1992
Trichlorofluoromethane	<1.0	ug/L	8240 (1)	06/22/1992
Xylenes	<1.0	ug/L	8240 (1)	06/22/1992

Brian Wanner, Manager
Rockford Division

OCEAN GROUP

NATIONAL ENVIRONMENTAL TESTING, INC.

NET Midwest, Inc.
Rockford Division
3548 35th Street
Rockford, IL 61109
Tel: (815) 874-2171
Fax: (815) 874-5622

ANALYTICAL REPORT

Mr. Greg Unger
STAR ENVIRONMENTAL CONSULT
225 N. JEFFERSON
P.O. BOX 206
Amboy, IL 61310

07/06/1992

Job No: 92.1951
Sample No: 105244

SAMPLE DESCRIPTION: Composite Sample Well #4,5,6
Central Quality

Date Taken: 06/09/1992
IEPA Cert. No.100220

Date Received: 06/15/1992
WDNR Cert. No.999447240

TEST NAME	RESULTS	UNITS	METHODS	DATE ANALYZED
TCLP - Chromium	0.009	mg/L	218.1 (3)	06/26/1992
TCLP - Lead	<0.10	mg/L	239.1 (3)	06/26/1992

Matrix spike correction factors have been applied to above TCLP results.

Brian Wanner, Manager
Rockford Division

OCEAN GROUP

Mary M.

Illinois Environmental Protection Agency 2200 Churchill Road, Springfield, IL 62706

217/782-6762

Refer to: 1410450001 -- Ogle
Central Quality Industries
Closure Plan Approved: February 11, 1986 Log #C-177
ILD005176441
RCRA-Closure

January 28, 1988

Central Quality Industries Inc.
Attn: Mr. Robert Hewes
900 South Division Avenue
P.O. Box 247
Polo, Illinois 61064

Dear Mr. Hewes:

The subject hazardous waste management facility was inspected by a representative of this Agency on March 16, 1987. The inspection revealed that the closure activity was completed in accordance with the approved closure plan dated February 11, 1986.

Certification that the container storage area (S01) had been closed in accordance with the approved closure plan by yourself, and an independent registered professional engineer, John J. Yates, P.E., of Illinois was received at this Agency January 21, 1987 and January 13, 1987.

The Agency has determined that the closure of the container storage area has apparently met the requirements of Interim Status Standards, 35 Ill. Admin. Code, Part 725 (40 CFR, Part 265). Please note, the Agency has withdrawn your Part A application dated November 18, 1980 to reflect the status change due to completed closure activities.

This facility must continue to meet the requirements of 35 IAC Section 722 Standards Applicable to Generators of Hazardous Waste.

If you have any questions, please contact Karen Nachtwey at 217/782-0892.

Very truly yours,

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:KEN:rmi/0085j/6

cc: Rockford Region
USEPA Region V, Mary Murphy
USEPA Region V, Art Kawatachi
John J. Yates, P.E.
Division File
Financial Assurance Unit
Compliance Monitoring

PC
entry

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

August 31, 1992

Mr. Dean Hamilton
P.O. Box 526
Dixon, Illinois 61021

Re: Visual Site Inspection
Central Quality Industries, Inc.
ILD 005 176 441

Dear Mr. Hamilton:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment including a Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104(e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern (AOCs) to make a cursory determination of their condition by visual observation. The definitions of SWMUs and AOCs are included in Attachment I. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of the units at the facility and the waste management practices used.

Facility Name CENTRAL QUALITY INDUSTRIES
Location (City, State) Polo, IL.
EPA I.D.# ILD. 005 176 441
Reviewer Name STEPHENSON
Date of Review 3/18/86

SUMMARY OF FACILITY CERTIFICATION
REGARDING POTENTIAL RELEASES
FROM SOLID WASTE MANAGEMENT UNITS

(1) Are there any solid waste management units?

Yes X No _____ Undetermined _____

(2) If answer to (1) is Yes, list the units by type, number and operating status. If answer to (1) is No or undetermined, go to Question (5).

	Type of Unit	Status
a.	DRUM STORAGE AREA (PER CORRESPONDENCE)	CLOSING
b.	OTHER: "RELEASED ON GROUND SURFACE" - NOT FROM DRUM STORAGE AREA	
c.		
d.		
e.		
f.		
g.		
h.		
i.		
j.		

(3) For each type of unit listed in (2), summarize the types and volumes of wastes handled.

	Type of Unit	Type of Waste	Volume of Wastes
a.	DRUM STORAGE AREA	Xylol (1950-1980)	700 gal/yr.
b.		ALKALINE STRIPPER (1950-1980)	1,000 gal/yr.
c.		CLEANING SOLN - HIGH CHROMATE level	2,000 GAL (1972-1977)
d.			
e.		CLEANING SOLN - NON-HAZ.	4,000 GAL. (1972-1977)
f.		CLEANING SOLN - NON-HAZ.	6,000 GAL./YR. (1977-1980)
g.		"ALL ABOVE WASTES"	1980 - PRESENT
h.			
i.			
j.			

(4) Summarize all releases of hazardous waste or constituents, and check box as to whether company claims it was fully corrected.

	Releases		Corrected?		
a.	"RELEASE" ONTO THE GROUND SURFACE	Yes ___	No ___	Undetermined X	
b.		Yes ___	No ___	Undetermined ___	
c.		Yes ___	No ___	Undetermined ___	
d.		Yes ___	No ___	Undetermined ___	
e.		Yes ___	No ___	Undetermined ___	
f.		Yes ___	No ___	Undetermined ___	
g.		Yes ___	No ___	Undetermined ___	
h.		Yes ___	No ___	Undetermined ___	
i.		Yes ___	No ___	Undetermined ___	
j.		Yes ___	No ___	Undetermined ___	

(5) Certification: Yes X No ___

(6) Is additional information necessary? Yes X No ___

(7) Comments: ① THERE HAVE BEEN NO RELEASES FROM THE DRUM STORAGE AREA. ② NO INFORMATION WAS SUBMITTED AS TO WHAT TYPE OF MATERIAL WAS "RELEASED ON THE GROUND SURFACE" OR WHERE IT WAS RELEASED FROM.

CENTRAL QUALITY INDUSTRIES, INC.

900 SOUTH DIVISION STREET • P.O. BOX 247
POLO, ILLINOIS 61064
area code 815/946-2311

ILD 005-176-441

February 26, 1986

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

RCRA Activities
Region V
P. O. Box A 3587
Chicago, IL 60690

Attention: ATKJG

Re: Request for Information on Past Releases of Waste Constituents

Gentlemen:

In an undated letter from Mr. Stringham received by us on January 20, 1986, you requested information pertaining to past releases of hazardous waste or constituents from any solid waste management unit at Central Quality Industries, Inc. You have asked whether such releases have "ever occurred" at the facility site. Your request is puzzling because the company is not seeking a RCRA permit. The company is closing its Drum Storage Area under interim status and a closure plan has been submitted to Illinois EPA. Therefore, Section 3004(u) of RCRA is inapplicable as no RCRA permit will be issued.

Nevertheless, without waiving any of our rights under the law, we are voluntarily providing you with the requested information. Your request presents some difficulty because the record keeping and reporting requirements in the past were significantly different than today. Additionally, there have been changes in personnel over the period covered by U. S. EPA's request. Consequently, information related to this period necessarily must be based on recollection and review and interpretation of available documents.

Central Quality Industries, Inc. has prepared the enclosed response and represents that the material contained therein is correct to the best of its current knowledge. The company reserves the right to supplement this response should additional information become available.

You have requested that our response to your request for information be certified and that the certification required by 40 CFR § 270.11(d) for permit applications and permit reports be used for this attestation. As previously noted, we are puzzled by this request because we are not applying for a RCRA permit and because there is no provision in 40 CFR Part 270 which requires the submission of such information. Accordingly, we are not using the Part 270 form of certification. Nevertheless, we will certify our response in the manner indicated in the enclosure to this letter.

The following information is being voluntarily supplied by the company and its submission should not be deemed a waiver of any of the company's rights under the law. The information is being supplied seriatim as appearing on your form.

Question 1: Other: Released on ground surface. Yes.

Question 2: Description of Wastes.

A diagram of the area is shown by the yellow shaded area attached as Enclosure 1.

Between 1950 and 1980, approximately 700 gallons per year of spent Xylol.

Between 1950 and 1980, approximately 1,000 gallons per year of an Alkaline Stripper.

Between 1972 and 1977, approximately 6,000 gallons of a cleaning solution, approximately 2,000 gallons of which had a potentially high chromate level. The balance of 4,000 gallons was non-hazardous.

Between 1977 and 1980, approximately 6,000 gallons per year of a non-hazardous cleaning solution.

Since May of 1980, the above wastes are being handled with proper EPA permits and disposal methods.

Question 3: There have been no releases of hazardous wastes or constituents to the environment from the Drum Storage Area. Regarding the area noted in the response to Question 2, sampling results indicate that there has been no significant impact on surface or groundwater quality. Enclosure 2 is a copy of the February 27, 1985 letter from Illinois EPA so confirming.

Question 4: Test results show no significant impact on surface or groundwater quality. Enclosure 3 is test results of both soil and water.

If clarification of any of the above information is needed, please contact me.

Sincerely,

CENTRAL QUALITY INDUSTRIES, INC.

Robert D. Hewes
Vice President - Manufacturing

RDH/plh

Encl.

cc: John Yates
Dixie Laswell
USEPA File

This document is signed by Mr. Robert D. Hewes solely to satify the United States Environmental Protection Agency's request for attestation. Central Quality Industries, Inc. represents that the information contained herein is correct to the best of its current knowledge, information and belief. Central Quality Industries, Inc. reserves the right to supplement this response should new or different information become available.

CENTRAL QUALITY INDUSTRIES, INC.

By: Robert D. Hewes

Robert D. Hewes
Vice President - Manufacturing

2-26-86

Date

CERTIFICATION REGARDING POTENTIAL RELEASES FROM
SOLID WASTE MANAGEMENT UNITS

FACILITY NAME: Central Quality Industries, Inc.

EPA I.D. NUMBER: 1410450001

LOCATION CITY: Polo

STATE: Illinois 61064

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION

	YES	NO
° Landfill		X
° Surface Impoundment		X
° Land Farm		X
° Waste Pile		X
° Incinerator		X
° Storage Tank (Above Ground)		X
° Storage Tank (Underground)		X
° Container Storage Area		X
° Injection Wells		X
° Wastewater Treatment Units		X
° Transfer Stations		X
° Waste Recycling Operations		X
° Waste Treatment, Detoxification		X
° Other released on ground surface	X	

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions and location at facility. Provide a site plan if available.

See Attached Letter

NOTE: Hazardous wastes are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

3. For the units noted in Number 1 above and also those hazardous waste units in your Part A application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring.

   Please provide the following information

   a. Date of release
   b. Type of waste released
   c. Quantity or volume of waste released
   d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

See Attached Letter

4. In regard to the prior or continuing releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

See Attached Letter

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

See Attached Certificate

Typed Name and Title

Signature

Date

F.1 Imagery/Special Studies